

Palo Verde 3

2Q/2014 Plant Inspection Findings

Initiating Events

Significance:  Sep 30, 2013

Identified By: NRC

Item Type: FIN Finding

Failure to Include Requirements in Preventative Maintenance Basis

The inspectors identified a Green finding for the failure of licensee personnel to follow Procedure 30DP-9MP08, "Preventive Maintenance Program." Specifically, plant personnel did not ensure that requirements for performing inspection and replacement of degraded tie-wraps in electrical cubicles were contained in preventative maintenance basis documents. Consequently, degraded cable tie-wraps in Unit 1 load center L02 were not inspected prior to a catastrophic electrical fault on July 2, 2013. The licensee rebuilt the load center cubicle and has entered this issue into their corrective action program as PVAR 4454845.

The failure to follow established procedures for updating preventive maintenance basis documents with requirements and recommendations from previous component failures was a performance deficiency. This performance deficiency is more than minor because it was associated with the procedure quality attribute of the Initiating Events Cornerstone and adversely affects the 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, by not including the requirements and recommendations from the history of previous failures in the preventive maintenance basis, pertinent operating experience was not considered when evaluating changes to the preventive maintenance program. Consequently, degraded cable tie-wraps in Unit 1 load center L02 were not inspected prior to experiencing a catastrophic electrical fault on July 2, 2013 that upset plant stability. The inspectors used the NRC Inspection Manual Chapter 0609, Attachment 4, "Phase 1 - Initial Screening and Characterization of Findings," to determine the significance. The inspectors determined that the finding was of very low safety significance (Green) because it did not contribute to both the likelihood of a reactor trip and the likelihood that mitigation equipment or functions would not be available. The inspectors also determined the issue had a cross-cutting aspect in the area problem identification and resolution associated with the operating experience component because the licensee did not implement and institutionalize operating experience through changes to the station's preventive maintenance program [P.2(b)].

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

Mitigating Systems

Significance:  Jun 30, 2014

Identified By: NRC

Item Type: NCV NonCited Violation

Failure to Follow Operator Challenges Procedure

Green. The inspectors identified a non-cited violation of 10 CFR Part 50, Appendix B, Criterion V, "Instructions, Procedures, and Drawings," for the failure of operations personnel to follow station procedures to ensure that appropriate contingency actions are entered in the operator challenge listing in the control room. Specifically, upon

discovery that the pressurizer master level controller could not be placed into manual mode on February 20, 2014, the licensee did not prescribe appropriate contingency actions for operation of the pressurizer level control system. As a result, on March 15, 2014, Unit 3 exceeded the pressurizer maximum level mandated by Technical Specification 3.4.9. The licensee subsequently replaced the faulty controller and has entered this issue in their corrective action program as Palo Verde Action Request 4540981.

The failure of operations personnel to follow station procedures for identifying, documenting, and tracking operator challenges was a performance deficiency. The performance deficiency was more than minor, and therefore a finding, because it adversely affected the configuration 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, the failure to document an operator work around in the pressurizer level control system allowed operators to place the system in a configuration that challenged the availability, reliability, and capability of the pressurizer to respond to reactor coolant system pressure transients. The inspectors evaluated the significance of the issue under the Significance Determination Process, as defined in Inspection Manual Chapter 0609.04, "Initial Characterization of Findings," and Inspection Manual Chapter 0609, Appendix A, "The Significance Determination Process (SDP) for Findings at-Power." The inspectors concluded the finding was of very low safety significance (Green) because all questions in Exhibit 2 could be answered in the negative. The inspectors determined that the finding had a cross-cutting aspect in the area of human performance because the licensee did not challenge the uncertain condition of the pressurizer level controller. Specifically, after identifying the unexpected failure of the pressurizer level controller, operations personnel did not fully evaluate and manage the risks associated with the degraded condition before proceeding [H.11]. (Section 40A2)
Inspection Report# : [2014003](#) (*pdf*)

Significance:  Apr 02, 2014

Identified By: NRC

Item Type: NCV NonCited Violation

Failure to Translate Design Basis Requirements for Establishing Operability of the Spray Pond System

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. These measures shall include provisions to assure that appropriate quality standards are specified and included in design documents and that deviations from such standards are controlled." Specifically, prior to February 7, 2014, the licensee used Engineering Calculation 13-NS-C088, "Mission Times for EW, SP, SI, AF, and DG systems," for establishing a 26-day mission time of the spray pond system instead of a 30-day availability time as required by Regulatory Guide 1.27, "Ultimate Heat Sink For Nuclear Power Plants," and approved in their safety evaluation report. Consequently, spray pond system operability determinations performed per Procedure 40DP-9OP26, "Operations PVAR Processing and Operability Determination/ Functional Assessment," used the incorrect mission time. In response to this issue, the licensee performed a review of the operability determinations in question using 30 days for the mission time and confirmed that the spray pond system remained operable and maintained an adequate safety margin. This finding was entered into the licensee's corrective action program as Palo Verde Action Request (PVAR) 4500910.

The team determined that the failure to ensure that design basis information associated with the mission time of the spray pond system was correctly translated into a procedure used to determine operability was a performance deficiency. This performance deficiency was more than minor because it adversely affected the Mitigating Systems Cornerstone attribute of Equipment Performance and 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 use the correct mission time when determining operability was a significant deficiency of design control in that operability determination evaluations could establish nonconservative results that could lead to the spray pond system not being able to meet its design safety function. In accordance with Inspection Manual Chapter 0609, Appendix A, "The Significance Determination Process (SDP) for Findings At-Power," dated June 19,

2012, Exhibit 2, “Mitigating Systems Screening Questions,” the issue screened as having very low safety significance (Green) because it was a design or qualification deficiency that did not represent a loss of operability or functionality; did not represent an actual loss of safety function of the system or train; did not result in the loss of one or more trains of non-technical specification equipment; and did not screen as potentially risk-significant due to seismic, flooding, or severe weather. This finding had a cross-cutting aspect in the area of human performance because the licensee implemented an engineering study with inaccurate information establishing the incorrect mission time used in operability determinations for the spray pond system.

Inspection Report# : [2013009](#) (*pdf*)

Significance:  Apr 02, 2014

Identified By: NRC

Item Type: NCV NonCited Violation

Deficiencies in Emergency Diesel Generator Engine Room and Control Room Ventilation Air Flow Testing and Evaluation

The team identified a Green, non-cited violation of 10 CFR Part 50, Appendix B, Criterion XI, “Test Control,” which states, in part, “A test program shall be established to assure that all testing required to demonstrate that structures, systems, and components will perform satisfactorily in service is identified and performed in accordance with written test procedures which incorporate the requirements and acceptance limits contained in applicable design documents.” Specifically, in June, 2013, the licensee failed to evaluate performance test results when high air flow measurements from the emergency diesel generator engine room and control room ventilation air flow performance tests contained values that were beyond the capability of the equipment. Consequently, the condition of the higher measured airflow had not been evaluated to determine if the test results were valid. In response to this issue, the licensee confirmed that the equipment had remained operable, based on the review of more accurate testing performed in 2006. This finding was entered into the licensee’s corrective action program as Palo Verde Action Request (PVAR) 4500070.

The team determined that the failure to establish and incorporate adequate air flow acceptance criteria into the emergency diesel generator control room supply fan and engine room exhaust fan performance tests was a performance deficiency. This performance deficiency was more than minor because it adversely affected the Mitigating Systems Cornerstone attribute of Equipment Performance and affected the cornerstone objective to ensuring the availability, reliability, and capability of systems that respond to initiating events to prevent undesirable consequences. Specifically, the failure to incorporate adequate acceptance criteria into the safety-related equipment performance tests was a significant deficiency of test control which could cause unacceptable fan performance conditions to go undetected. In accordance with Inspection Manual Chapter 0609, Appendix A, “The Significance Determination Process (SDP) for Findings At-Power,” dated June 19, 2012, Exhibit 2, “Mitigating Systems Screening Questions,” the issue screened as having very low safety significance (Green) because it was a design or qualification deficiency that did not represent a loss of operability or functionality; did not represent an actual loss of safety function of the system or train; did not result in the loss of one or more trains of non-technical specification equipment; and did not screen as potentially risk-significant due to seismic, flooding, or severe weather. This finding had a cross-cutting aspect in the area of human performance because the licensee failed to use decision-making practices that emphasize prudent choices over those that are simply allowable.

Inspection Report# : [2013009](#) (*pdf*)

Significance:  Apr 02, 2014

Identified By: NRC

Item Type: NCV NonCited Violation

Failure to Establish Adequate Procedures for an Alternate Source of Spray Pond Inventory

The team identified a Green, non-cited violation of Technical Specification 5.4.1, which states, in part, “Written procedures shall be established, implemented, and maintained covering the following activities: Part a. The applicable

procedures recommended in Regulatory Guide 1.33, Revision 2, Appendix A, February 1978.” Section 6 of Regulatory Guide 1.33, Appendix A, requires procedures for combating emergencies and other significant events. Specifically, prior to January 24, 2014, emergency procedures to provide make-up water to the essential spray pond beyond its 26 day water inventory did not provide sufficient details and contained inaccuracies for supplying the essential spray ponds with water from the regional aquifer via a well. In response to this issue, the licensee confirmed that there had never been an event at the site for which the procedure would have been utilized. This finding was entered into the licensee’s corrective action program as Palo Verde Action Requests (PVARs) 4496901, 4497291, 4498167, and 4499085.

The team determined that the failure to establish adequate procedures for an alternate source of spray pond inventory was a performance deficiency. This performance deficiency was more than minor because it adversely affected the Mitigating Systems Cornerstone attribute of Procedure Quality and affected the cornerstone objective to ensure the availability, reliability, and capability of systems that respond to initiating events to prevent undesirable consequences. Specifically, the continuous capability of the ultimate heat sink to perform its safety function beyond the 26-day inventory of the essential spray ponds was not ensured. In accordance with Inspection Manual Chapter 0609, Appendix A, “Significance Determination Process (SDP) for Findings At-Power,” dated June 19, 2012, Exhibit 2, “Mitigating Systems Screening Questions,” the issue screened as having very low safety significance (Green) because it was a design or qualification deficiency that did not represent a loss of operability or functionality; did not represent an actual loss of safety function of the system or train; did not result in the loss of one or more trains of non-technical specification equipment; and did not screen as potentially risk-significant due to seismic, flooding, or severe weather. The team determined that this finding did not have a cross-cutting aspect because the most significant contributor did not reflect current licensee performance.

Inspection Report# : [2013009](#) (pdf)

Significance:  Apr 02, 2014

Identified By: NRC

Item Type: NCV NonCited Violation

Improper Extension of Surveillance Interval for Surveillance Requirements Associated with the Engineered Safety Features Actuation Signal (ESFAS) Sequencer and Relays

The team identified a Green, non-cited violation of Technical Specification 5.5.18, “Surveillance Frequency Control Program” which states, in part, “This program provides controls for Surveillance Frequencies. The program shall ensure that Surveillance Requirements specified in the Technical Specifications are performed at intervals sufficient to assure the associated Limiting Conditions for Operation are met.” Part (b) states, “Changes of the Frequencies listed in the Surveillance Frequency Control Program shall be made in accordance with NEI 04-10, ‘Risk-Informed Method for Control of Surveillance Frequencies,’ Revision 1.” Specifically, prior to February 3, 2014, previous regulatory commitments for the engineered safety features actuation signal system surveillance test frequencies were not properly addressed as required by Technical Specification 5.5.18.b and NEI 04-10. The licensee did not follow the guidance of NEI 04-10 when they revised the Surveillance Frequency Control Program to test each train of the engineered safety features actuation signal system from every 18 months to every 36 months. In response to this issue, the licensee confirmed that the engineered safety features actuation signal system remained operable because the system had been tested satisfactory and none of the technical specification surveillances were overdue. This finding was entered into the licensee’s corrective action program as Palo Verde Action Requests (PVARs) 4500910 and 4500874.

The team determined that the failure to adequately address a regulatory commitment when extending the surveillance testing frequency associated with the engineered safety features actuation signal system was a performance deficiency. This performance deficiency was more than minor because it was associated with the Mitigating Systems Cornerstone attribute of Equipment Performance, and adversely affected the cornerstone objective of ensuring the availability, reliability, and capability of the engineered safety features actuation signal system to respond to initiating events to

prevent undesirable consequences. Specifically, the NRC commitment identified in document RCTSAI 7673 committed the licensee to: “the BOP ESFAS system will be fully tested at least every 18 months at the time of refueling.” When making a change to the Surveillance Frequency Control Program associated with the surveillance test frequency of the engineered safety features actuation signal system, the licensee failed to collect and review all commitments made to the NRC as required by NEI 04-10, “Risk-Informed Method for Control of Surveillance Frequencies,” Revision 1, and failed to follow the requirements of NEI 99-04, “Guidelines for Managing NRC Commitment Changes,” Revision 0. In accordance with NRC Inspection Manual Chapter 0609, Appendix A, “The Significance Determination Process (SDP) for Findings At-Power,” dated June 19, 2012, Exhibit 2, “Mitigating Systems Screening Questions,” the issue screened as having very low safety significance (Green) because it was a design or qualification deficiency that did not represent a loss of operability or functionality; did not represent an actual loss of safety function of the system or train; did not result in the loss of one or more trains of non-technical specification equipment; and did not screen as potentially risk-significant due to seismic, flooding, or severe weather. This finding had a cross-cutting aspect in the area of human performance because the licensee leaders did not use a systematic process for evaluating and implementing change so that nuclear safety remains the overriding priority.

Inspection Report# : [2013009](#) (pdf)

Significance:  Mar 28, 2014

Identified By: NRC

Item Type: NCV NonCited Violation

Failure To Provide Adequate Technical Justification For Operability of Containment Spray and Diesel Fuel Oil Systems

The inspectors identified multiple examples of a Green non-cited violation of 10 CFR Part 50, Appendix B, Criterion V, “Instructions, Procedures, and Drawings,” for the failure of operations personnel to follow station procedures used to perform operability determinations. Specifically, operations personnel failed to provide sufficient technical justification for the reasonable assurance of operability of a degraded condition involving one train of containment spray system and nonconforming conditions associated with diesel fuel oil piping.

The inspectors concluded the failure of operations personnel to follow station procedures to perform operability determinations was a performance deficiency. The performance deficiency was more than minor, and therefore a finding, because it adversely affected the equipment performance 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. The inspectors evaluated the significance of the issue under the Significance Determination Process, as defined in Inspection Manual Chapter 0609.04, “Initial Characterization of Findings,” and 0609, Appendix A, “The Significance Determination Process (SDP) for Findings at-Power.” The inspectors concluded the finding was of very low safety significance (Green) because all questions in Exhibit 2 could be answered in the negative. The inspectors determined that the finding had a consistent process cross-cutting aspect in the area of human performance because the licensee did not use a consistent and systematic process to make decisions (H.13).

Inspection Report# : [2014007](#) (pdf)

Significance:  Mar 28, 2014

Identified By: NRC

Item Type: FIN Finding

Failure to Follow Station Process for Root Cause Evaluation

The inspectors identified a Green finding for the failure of station personnel to follow procedures to implement root cause evaluations. Specifically, approximately one third of the root cause evaluations reviewed by inspectors resulted

in a probable cause with further information needed to validate the cause. Of this subset, eighty percent of the evaluations did not adhere to station processes.

The failure of station personnel to follow station procedures to implement root cause evaluations was a performance deficiency. The performance deficiency was more than minor, therefore a finding, because if left uncorrected the performance deficiency could become a more significant safety concern in that significant conditions adverse to quality could reoccur prior to the implementation of appropriate corrective action. The finding is associated with multiple cornerstones, though it is most closely associated with the Mitigating Systems Cornerstone and the cornerstone objective of ensuring the availability, reliability, and capability of systems that respond to initiating events to prevent undesirable consequences. The inspectors evaluated the significance of the issue under the Significance Determination Process, as defined in Inspection Manual Chapter 0609.04, "Initial Characterization of Findings," and 0609, Appendix A, "The Significance Determination Process (SDP) for Findings at-Power." The inspectors concluded the finding was of very low safety significance (Green) because all questions in Exhibit 2 could be answered in the negative. The inspectors determined that the finding had a consistent process cross-cutting aspect in the area of human performance because the licensee did not use a consistent and systematic approach when making decisions (H.13).

Inspection Report# : [2014007](#) (*pdf*)

Significance:  Dec 31, 2013

Identified By: NRC

Item Type: NCV NonCited Violation

Inadequate Modification of Safety Related Accumulators

The inspectors identified a Green non-cited violation of 10 CFR 50, Appendix B, Criterion III, "Design Control," for the failure to assure that a modification to the main steam and main feedwater isolation valve accumulators was suitable for the reliable operation of these components. Specifically, on September 4, 2009, the licensee failed to assess the suitability of a small dead band for a thermal relief valve in the accumulator valve manifold assembly and the impact on reliable operation of the associated valves. The licensee entered this issue into the corrective action program as Palo Verde Action Request 4429273. The licensee isolated the thermal relief valve from the actuators.

The failure to assure that the modification of the main steam and main feedwater isolation valve accumulators was suitable for the reliable operation of these components was a performance deficiency. The performance deficiency is more than minor, and therefore is a finding, because it was associated with the Mitigating Systems Cornerstone attribute of equipment performance and adversely affects the cornerstone objective of ensuring the availability, reliability, and capability of systems that respond to initiating events to prevent undesirable consequences. The inspectors evaluated the significance of the issue under the Significance Determination Process, as defined in Inspection Manual Chapter 0609.04, "Initial Characterization of Findings," and 0609 Appendix A, "The Significance Determination Process (SDP) for Findings at-Power." The inspectors concluded the finding was of very low safety significance (Green) because all questions in Exhibit 2 could be answered in the negative. The inspectors determined that the finding had a cross-cutting aspect in the area of human performance associated with resources component because the licensee did not maintain design margins by minimizing long standing equipment issues.

Inspection Report# : [2013005](#) (*pdf*)

Barrier Integrity

Significance:  Apr 02, 2014

Identified By: NRC

Item Type: NCV NonCited Violation

Failure to Follow Surveillance Testing Procedure

The team identified a Green, non-cited violation of 10 CFR Part 50, Appendix B, Criterion V, “Instructions, Procedures, and Drawings,” which states, in part, “Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings.” Specifically, between November 5, 2010 and September 17, 2012, the licensee failed to follow Procedure 73DP-9ZZ14, “Surveillance Testing,” Step 3.6.1, “Failed Step or Out of Tolerance Data,” which requires personnel to write a Palo Verde Action Request (PVAR) when a failed surveillance test is encountered. On three separate occasions, the licensee failed to initiate a Palo Verde action request when the containment air lock door seal surveillance test failed. In response to this issue, the licensee confirmed that minor maintenance had been performed on the containment air lock door seals immediately following the failure of the surveillances and the surveillances then met the procedure requirements. This finding was entered into the licensee’s corrective action program as Palo Verde Action Requests (PVARs) 4499119 and 4499123.

The team determined that the failure to follow Procedure 73DP-9ZZ14, “Surveillance Testing,” which required maintenance personnel to write a Palo Verde action request upon the failure of a surveillance test, was a performance deficiency. This performance deficiency was more than minor because if left uncorrected, it would lead to a more significant safety concern. Specifically, by not initiating Palo Verde action requests for failed surveillances, the licensee missed the opportunity to enter the failures into their corrective action program, perform formal operability determinations, consider the conditions for identification of maintenance rule functional failures, identify performance trends, and ultimately, correct the adverse condition in a timely manner. In accordance with Inspection Manual Chapter 0609, Appendix A, “The Significance Determination Process (SDP) for Findings At-Power,” dated June 19, 2012, Exhibit 3, “Barrier Integrity Screening Questions,” the issue screened as having very low safety significance (Green) because it did not represent an actual open pathway in the physical integrity of reactor containment and did not involve an actual reduction in function of hydrogen igniters in the reactor containment. This finding had a cross-cutting aspect in the area of human performance because licensee leaders failed to ensure that personnel, equipment, procedures, and other resources are available and adequate to support nuclear safety.

Inspection Report# : [2013009](#) (*pdf*)

Emergency Preparedness

Significance:  Sep 30, 2013

Identified By: NRC

Item Type: NCV NonCited Violation

Failure to Maintain an effective Emergency Plan for a Seismic Event

The inspectors identified a non-cited violation of 10 CFR 50.54 (q)(2) for the failure to maintain an effective emergency plan action level scheme in accordance with 50.47(b)(4). Specifically, the Alert threshold for HA1.1, “Natural or Destructive Phenomena Affecting VITAL AREAS,” requires a declaration of an Alert for a seismic event greater than operating basis earthquake as indicated by any force balance accelerometer reading greater than 0.10g. Operators rely on alarms to verify the acceleration beyond the operating basis earthquake and the inspectors determined the seismic monitor alarm set point was 0.13g. This could result with the inability of operations personnel

to classify an event at the Alert level. A design change modified the seismic monitoring set point to 0.1g and restored compliance. The licensee entered the issue into their corrective action program as Palo Verde Action Request 3624077.

The inspectors determined that the failure to maintain an effective emergency action level scheme was a performance deficiency. The performance deficiency was more than minor, and therefore a finding, because it adversely affected the Emergency Response Organization Performance attribute of the Emergency Preparedness Cornerstone and its objective to ensure that the licensee is capable of implementing adequate measures to protect the health and safety of the public in the event of a radiological emergency. Specifically, the licensee's ability to declare an Alert based on Natural Phenomenon at the correct threshold was degraded. The inspectors assessed the significance of the finding in accordance with NRC Inspection Manual Chapter (IMC) 0609, Appendix B, "Emergency Preparedness Significance Determination Process," Figure 5.4-1, and determined the finding to be of very low safety significance because compensatory measures were available for emergency response organization personnel to perform the classification duties. The inspectors determined this finding is not indicative of current performance and therefore no cross-cutting aspect is assigned.

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

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 : August 29, 2014