

Callaway

3Q/2014 Plant Inspection Findings

Initiating Events

Significance: G Sep 27, 2014

Identified By: Self-Revealing

Item Type: FIN Finding

Failure to Install a Modification per the Design

The inspectors reviewed a self-revealing non-cited violation of 10 CFR Part 50, Appendix B, Criterion V, “Instructions, Procedures, and Drawings,” for the licensee’s failure to perform nondestructive testing on portions of the essential service water system known to be susceptible to wall thinning in accordance with procedures. As a result, the licensee failed to identify wall thinning prior to developing a through-wall leak that rendered train A inoperable. Specifically, despite procedural guidance to the contrary, technicians only used the low frequency electromagnetic technique testing, which cannot monitor bends and portions of welds. They also failed to properly calibrate this equipment, and failed to perform ultrasonic testing on the portions of essential service water system that could not be properly monitored by use of low frequency electromagnetic technique. The resultant through-wall leaks were repaired according to ASME code standards. The licensee entered this issue into their corrective action program as Callaway Action Request 201405200 and planned to re-perform testing during the fall of 2014.

Failure to follow procedures while performing nondestructive testing on portions of the essential service water system was a performance deficiency. This performance deficiency is more than minor because it affected the equipment performance attribute of the Mitigating Systems Cornerstone and affected the cornerstone objective to ensure the availability, reliability, and capability of systems that respond to initiating events to prevent undesirable consequences. Specifically, failure to perform nondestructive testing on portions of the essential service water system that were known to be susceptible to wall thinning resulted in the failure to prevent a through-wall leak affecting the availability of a safety related system. Using NRC Inspection Manual 0609, Appendix A, “The Significance Determination Process for Findings At-Power,” the finding was determined to be of very low safety significance because it only affected a single train, and resulted in a loss of function for less than its technical specifications allowed outage time. This finding has a procedure adherence cross-cutting aspect within the human performance area because the licensee failed to ensure that individuals followed processes, procedures, and work instructions. Specifically, licensee oversight failed to ensure that contractors followed specific guidance in their procedures for both ensuring that the low frequency electromagnetic technique tool was appropriately calibrated and areas unable to be scanned were tested utilizing ultrasonic testing [H.8].

Inspection Report# : [2014004](#) (*pdf*)

Significance: G Mar 28, 2014

Identified By: Self-Revealing

Item Type: FIN Finding

Failure to Correct a Design Deficiency in Main Generator Bus Duct Cooling System

The inspectors reviewed a self-revealing finding involving the failure to correct a design deficiency known to represent a single point plant trip vulnerability. Specifically, Procedure EDP-ZZ-01131, “Callaway Plant Health Program,” required documenting and correcting Health Issues, which included single point vulnerabilities. Health Issue 2005028 was written to identify that dampers in the main generator bus duct cooling system were not designed for the flow rate they experienced. This document was subsequently closed without correcting the single point

vulnerability it was written to address. Also, in 2011, after Callaway Action Request 201108672 identified that this concern still existed, the licensee failed to document the condition as a new Health Issue or correct the condition. As a result, the damper blades came loose and entered the bus duct, which resulted in a fault on the auxiliary transformer and a subsequent unit trip in July 2013. As a result of the trip, the site performed a modification to remove the single point vulnerability and documented the issue in their corrective action program as Callaway Action Request 201305943.

The inspectors determined that failure to correct a design deficiency known to represent a single point plant trip vulnerability was a performance deficiency. This performance deficiency was more than minor because it is associated with the design control attribute of the Initiating Events Cornerstone and affects the cornerstone objective to limit the likelihood of events that upset plant stability and challenge critical safety functions during shutdown as well as power operations. Specifically, the failure to correct a long term design issue resulted in an electrical fault and subsequent reactor trip. The inspectors assessed the finding in accordance with NRC Inspection Manual 0609, Appendix A, Exhibit 1, "Initiating Event Screening Questions," and determined the finding required a detailed risk evaluation because the performance deficiency caused an initiating event and affected some mitigating equipment. Therefore, a senior reactor analyst performed a detailed risk evaluation. The analyst determined that the finding was of very low safety significance (Green). The bounding change to the core damage frequency was approximately $4.2E-7$ /year. The dominant core damage sequences involved transients that led to anticipated transient without scram events. The recovery of the startup transformer, the recovery of the circulating water pumps, and the availability of the auxiliary feedwater system helped minimize the risk significance. This finding has a cross-cutting aspect in the consistent process component of the human performance cross-cutting area because the licensee failed to use a consistent, systematic approach to make decisions and risk insights were not incorporated as appropriate. Specifically, despite identifying a single point vulnerability that could have caused a plant trip in 2011, the licensee's processes were not properly utilized to address the issue and risk insights were not used properly to elevate the importance of the issue to ensure the licensee took appropriate action.

Inspection Report# : [2014002](#) (*pdf*)

Mitigating Systems

Significance: G Sep 27, 2014

Identified By: Self-Revealing

Item Type: NCV NonCited Violation

Failure to Perform Nondestructive Testing on Essential Service Water Piping

The inspectors reviewed a self-revealing finding involving failure to verify the proper material was installed in the plant during a modification to the circulating water pumps. Specifically, Request for Resolution 201300416 specified the use of ASTM A276 410 stainless steel cap screws with a tensile strength around 186 ksi. Contrary to this, 410 stainless steel cap screws with a tensile strength between 201 ksi and 221 ksi were installed. Because the tensile strength was much higher, and thus more brittle and susceptible to stress corrosion, these cap screws were not appropriate for the application. This led to failure of the cap screws and the separation of the shaft coupling for circulating water pump B after less than one operating cycle in service, degrading condenser vacuum. The licensee removed the modification and installed the original type cap screws. This issue was entered into the licensee's corrective action program as Callaway Action Request 201404722.

The inspectors determined that failure to verify the correct materials were installed in the plant during a modification was a performance deficiency. This performance deficiency is more than minor because it is associated with the equipment performance attribute of the Initiating Events Cornerstone and affects the cornerstone objective to limit the likelihood of events that upset plant stability and challenge critical safety functions during shutdown as well as during

power operations. Specifically, failure to install the correct material resulted in failure of circulating water pump B and degrading condenser vacuum. The inspectors evaluated the finding using NRC Inspection Manual 0609, Appendix A, Exhibit 1, "Initiating Event Screening Questions." The inspectors determined the finding was of very low safety significance (Green) because the transient initiator did not cause a reactor trip and the loss of mitigating equipment. This finding has an avoid complacency cross-cutting aspect within the human performance area because the licensee relied on the vendor to provide the correct material and did not verify the cap screws met the material specification [H.12].

Inspection Report# : [2014004](#) (*pdf*)

Significance:  Jul 02, 2014

Identified By: NRC

Item Type: NCV NonCited Violation

Failure to Establish Adequate Procedures for Testing the Load Tap Changers on Transformers XNB01 and XNB02.

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." Regulatory Guide 1.33, Appendix A, Section 9, "Procedures for Performing Maintenance," states in part, "Maintenance that can affect the performance of safety-related equipment should be properly pre-planned and performed in accordance with written procedures, documented instructions, or drawings appropriate to the circumstances." Specifically, from 2002 to April 24, 2014, due to the ineffective corrective action of Callaway Action Request (CAR) 200202970, the licensee did not establish preventative maintenance procedures to verify the operation and timing of the engineered safety feature transformers XNB01 and XNB02 load tap changers. In response to this issue, the licensee verified that immediate operability was not a concern since the measured parameters for the transformers did not indicate poor health or unsatisfactory performance. This finding was entered into the licensee's corrective action program as Callaway Action Request (CAR) 201402827.

The team determined that the failure to establish adequate preventative maintenance procedures to periodically verify the operation and timing of the engineered safety feature transformers XNB01 and XNB02 load tap changers was a performance deficiency. This finding was more than minor because it adversely affected the Mitigating Systems Cornerstone attribute of Equipment Performance 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 perform initial or periodic verification of the operation and timing of the engineered safety feature transformers XNB01 and XNB02 load tap changers could result in adverse operation of the load tap changer during a design basis event such that the safety-related buses may not have adequate voltage to reset the degraded voltage relay, thus spuriously disconnecting from the offsite power source. 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. This finding did not have a cross-cutting aspect because the most significant contributor did not reflect current licensee performance.

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

Significance:  Jul 02, 2014

Identified By: NRC

Item Type: NCV NonCited Violation

10 CFR 50.59 Screen for the Auxiliary Feedwater Motor Operated Control Valves Thermal Overload Relays.

The team identified a Severity Level IV, non-cited violation of 10 CFR Part 50.59, "Changes, Tests and Experiments," which states, in part, "A licensee may make changes in the facility as described in the final safety analysis report, make changes in the procedures as described in the final safety analysis report, and conduct tests or experiments not described in the final safety analysis report without obtaining a license amendment only if: (ii) The change, test, or experiment does not meet any of the criteria in paragraph (c)(2) of this section." Paragraph (c)(2), states in part: "A licensee shall obtain a license amendment prior to implementing a proposed change, test, or experiment if the change, test, or experiment would: (ii) Result in more than a minimal increase in the likelihood of occurrence of a malfunction of a structure, system, or component (SSC), important to safety previously evaluated in the final safety analysis report." Specifically, on September 5, 2008, the licensee failed to complete a 10 CFR Part 50.59 Evaluation when they initiated Final Safety Analysis Report Change Notice (FSARCN) 08-012 to Final Safety Analysis Report Section 8.3.1.1.2, to exempt auxiliary feedwater control valves (ALHV0005, 0007, 0009, and 0011) from the requirements of Regulatory Guide 1.106, "Thermal Overload Protection for Electric Motors on Motor-Operated Valves," Revision 1. For these auxiliary feedwater control valves, the licensee chose to leave the thermal overload relays in the motor operated valve circuits continuously, but failed to periodically test them to ensure continued functional reliability and the accuracy of the trip point. In response to this issue, the licensee verified that no actual safety consequences had occurred with the auxiliary feedwater system motor operated control valves. This finding was entered into the licensee's corrective action program as Callaway Action Request (CAR) 201403369.

The team determined that the licensee's failure to identify that the proposed Final Safety Analysis Report change to their commitment to Regulatory Guide 1.106 Revision 1, requiring an evaluation to be performed, was a performance deficiency. This finding was evaluated using traditional enforcement because it had the potential for impacting the NRC's ability to perform its regulatory function. This finding was more than minor because there was a reasonable likelihood that the change would have required NRC review and approval prior to implementation. Specifically, during the 10 CFR Part 50.59 screen, the licensee failed to determine that the proposed Final Safety Analysis Report change to their commitment to Regulatory Guide 1.106, Revision 1, did involve a change to a structure, system, or component, such that it did adversely affect an Final Safety Analysis Report described design function, which required an evaluation to be performed. In accordance with Inspection Manual Chapter 0612, Appendix B, "Issue Screening," traditional enforcement does apply as the violation impacted the regulatory process. Using 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. The team assessed the violation in accordance with the Enforcement Policy, and determined it to be a Severity Level IV violation because it resulted in a condition evaluated by the Significance Determination Process as having very low safety significance (Enforcement Policy example 6.1.d.2). This finding did not have a cross-cutting aspect because cross-cutting aspects are not assigned to traditional enforcement violations. Inspection Report# : [2014007](#) (*pdf*)

Significance:  Jul 02, 2014

Identified By: NRC

Item Type: NCV NonCited Violation

Failure to Follow Procedures by Not Identifying a Conflict Between Two Procedures

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, on October 23, 2006, the licensee failed to follow Procedure APA-ZZ-00101, "Processing Procedures, Manuals, and Desktop Instructions," when the reviewer

did not realize that a revised step in Procedure EDP ZZ 01126, "Lubrication Predictive Maintenance Program," Revision 6, conflicted with requirements in Procedure APA-ZZ-00500, "Corrective Action Program." The licensee failed to identify that a new procedure step, which allowed licensee personnel the discretion to not initiate a Callaway Action Request when an abnormal or adverse condition was identified, was in conflict with expectations for initiating Callaway Action Requests for adverse conditions stated in Procedure APA-ZZ-00500. In response to this issue, the licensee will review their guidance documents and procedure training, along with their root cause procedure, because the conflict with the procedures had not been identified during the root cause investigation of the Essential Service Water Pump "B" lower motor bearing degradation. This finding was entered into the licensee's corrective action program as Callaway Action Request (CAR) 201403046.

The team determined that the failure to identify that a revised step in Procedure EDP-ZZ-01126 was conflicting with expectations for initiating Callaway Action Requests for adverse conditions stated in Procedure APA-ZZ-00500 was a performance deficiency. This finding was more than minor because if left uncorrected, it had the potential to lead to a more significant safety concern. Specifically, Revision 6 to Procedure EDP-ZZ-01126, "Lubrication Predictive Maintenance Program," was revised to allow licensee personnel the discretion of not using the Callaway Action Request System to document an abnormal or adverse condition when a bad oil sample had been identified. Consequently, the lubrication predictive maintenance program procedure, as written, has the potential to miss diagnosing/reporting of equipment problems and degradation prior to equipment failure. The original oil sample taken in October 2012 indicated a degraded condition, and it was not until a subsequent oil sample taken in February 2013, caused the licensee to write a Callaway Action Request when the Essential Service Water Pump "B" lower motor bearing had degraded, and the pump was taken out-of-service for replacement. 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 did not have a cross-cutting aspect because the most significant contributor did not reflect current licensee performance.

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

Significance: G Jul 02, 2014

Identified By: NRC

Item Type: NCV NonCited Violation

Failure to Establish Essential Service Water Pump House Supply Fan Testing.

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, from 1999 to April 17, 2014, the licensee failed to establish a test program to demonstrate that the air flows for essential service water pump house supply fans CGD01A and CGD01B would keep the pump house room temperatures at or below the maximum allowable temperatures when the essential service water pumps are operating during a design basis accident. In response to this issue, the licensee verified that immediate operability was not a concern since the measured parameters (through eMAX and Motor Circuit Evaluator-+ testing) did not indicate poor health or unsatisfactory performance when compared to the fan curve. This finding was entered into the licensee's corrective action program as Callaway Action Request (CAR) 201402698.

The team determined that the failure to establish a test program to demonstrate that the air flows for the essential service water pump house supply fans were sufficient to keep room temperatures maintained at or below the design basis requirements was a performance deficiency. This finding 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 capability of the essential service water pump house supply fans to perform their safety function of providing 30,000 cubic feet per minute of air flow was not ensured. 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 did not have a cross-cutting aspect because the most significant contributor did not reflect current licensee performance.

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

Significance: G Jul 02, 2014

Identified By: NRC

Item Type: NCV NonCited Violation

Failure to Adequately Analyze Maximum Electrical Equipment Temperatures Resulting from the Single Failure of Control Building Heating Ventilation/Air Conditioning.

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 April 25, 2014, the licensee had failed to account for the temperature differences between inside and outside of electrical cabinets in the Class 1E electrical rooms, as well as the effects of these increased temperatures on the components in the cabinets with a single control building chiller out-of-service. In response to this issue, the licensee performed a preliminary review of the calculation and confirmed that the components within the cabinets would continue to function in the event of a transient or accident with a single control building chiller out-of-service. This finding was entered into the licensee's corrective action program as Callaway Action Request (CAR) 201402872.

The team determined that the failure to adequately account for increased temperatures within the Class 1E electrical cabinets, and the effect on the components in those cabinets, was a performance deficiency. This finding 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 evaluate the increased temperatures within the cabinets in Calculation NAI-1719-001 could establish non-conservative results that could lead to component failures, causing critical electrical equipment not to 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, pertaining to identification, in the area of problem identification, because the licensee did not ensure that the organization implements a corrective action program with a low threshold for identifying issues. Individuals identify issues completely, accurately, and in a timely manner in accordance with the program.

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

Significance: G Jul 02, 2014

Identified By: NRC

Item Type: NCV NonCited Violation

Failure To Review Motor Operated Valve (MOV) Data and Complete Analysis of the Data in a Timely Manner.

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 2013 and April 2014, the licensee did not follow Procedure EDP-ZZ-01114, “Motor Operated Valve Program Guide,” Step 6.3.1, as they had not completed a test report for Motor Operated Valve BNLCV0112E, “Centrifugal Charging Pump Suction from Refueling Water Storage Tank Isolation Valve,” within 60 days, as required by the procedure. The results of the analysis, when completed, were non-conservative with the measured stem coefficient increasing from the design value of 1.5 to approximately 1.7, decreasing the available torque margin from approximately 23 percent to 7 percent. In response to this issue, the licensee confirmed that all of the values in the Performance Report for BNLCV0112E were accurate and that the valve would still function. The licensee also initiated a work order to restore the valve margin. The licensee determined that several other diagnostic test results had not been analyzed in a timely manner; and evaluated these results which were found to be acceptable. This finding was entered into the licensee's corrective action program as Callaway Action Requests (CARs) 201402987 and 201402992.

The team determined that the failure to follow Procedure EDP-ZZ-01114 for the timely evaluation of motor operated valve test data was a performance deficiency. This finding was more than minor because if left uncorrected, it would lead to a more significant safety concern. Specifically, not reviewing motor operated valve data and completing the analysis of the data in a timely manner could result in safety-related motor operated valves not being able to meet their 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, pertaining to resources, 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# : [2014007](#) (*pdf*)

Significance: G Jul 02, 2014

Identified By: NRC

Item Type: NCV NonCited Violation

Failure to Adequately Account for Motor Operated Valve Unseating Torque in Torque Calculation.

The team identified a Green non-cited violation of 10 CFR 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, prior to May 1, 2014, the licensee failed to include the motor operated valve unseating torque in the motor operated valve torque calculation. This could establish non-conservative results that could lead to the valve not functioning. In response to this concern, the licensee performed informal analyses based on the most recent test results and verified that all the subject valves were functional. This finding was entered into the licensee's corrective action program as Callaway Action Request (CAR) 201403034.

The team determined that the failure to include the motor operated valve unseating torque in the calculation of the

required torque was a performance deficiency. This finding 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 include the valve disc unseating force in the torque calculation could establish non-conservative results that could lead to a failure of the valve to perform its safety function. The initial evaluation, based on a design friction coefficient of 0.2, identified four valves with zero or negative margin, however additional evaluation determined these valves were functional. 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 did not have a cross-cutting aspect because the most significant contributor did not reflect current licensee performance.

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

Significance: G Jul 02, 2014

Identified By: NRC

Item Type: NCV NonCited Violation

Inadequate Procedure for Cooling Instrumentation During a Station Blackout Event.

The team identified a Green, non-cited violation of 10 CFR Part 50.63(a)(2) which states, in part, "The reactor core and associated coolant, control, and protection systems, including station batteries and any other necessary support systems, must provide sufficient capacity and capability to ensure that the core is cooled and appropriate containment integrity is maintained in the event of a station blackout for the specified duration." Specifically, from April 15, 2011 to July 2, 2014, a change made to Emergency Operating Procedure Addendum 20, "Control Room Cabinet Door List," Revision 003, required control room operators to open a minimum of one control room cabinet door during a station blackout. Emergency Operating Procedure Addendum 20, Revision 003, was completed without any analysis or calculations performed to justify whether the electronics in the cabinets would have sufficient cooling with a minimum of one door open during a station blackout. This could result in insufficient cooling to the Solid State Protection System (SSPS) and other essential controls during a station blackout. In response to this issue, the licensee initiated actions to make the procedures consistent regarding how many doors should be opened for the given cabinets, and for engineering to investigate how many doors should be opened. This finding was entered into the licensee's corrective action program as Callaway Action Request (CAR) 201403029.

The team determined that the failure to ensure that components located in control room cabinets, which provide input for the Solid State Protection System (SSPS), would remain operable during a station blackout, as assumed in the site's station blackout analysis, was a performance deficiency. This finding 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 change made to EOP Addendum 20, Revision 003, had been completed without documented review of the site's station blackout analysis or its assumptions to justify whether the components in the cabinets would have sufficient cooling with a minimum of one door open per cabinet during a station blackout. By not analyzing the concern to determine the effect of the temperature of the instrumentation and components in the cabinets, the licensee may subject the electronic components contained in the cabinets to temperatures that could degrade their capability to ensure core cooling and containment integrity. 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, pertaining to change management, in the area of human performance, because the licensee had not used a systematic process for evaluating and implementing change so that nuclear safety remains the overriding priority. Without documented results of an analysis or justification, for the 2011 evaluation, the assumptions could not be verified to justify their actions.

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

Significance:  Jun 30, 2014

Identified By: NRC

Item Type: NCV NonCited Violation

Inadequate Extent of Condition Review

The inspectors identified a non-cited violation of 10 CFR Part 50, Appendix B, Criterion V, “Instructions, Procedures, and Drawings,” for the licensee’s failure to perform an adequate extent of condition assessment. While performing an evaluation of pitting corrosion identified on buried refueling water storage piping, the licensee failed to provide an adequate technical justification for not expanding the scope of their review beyond the specific piping when pitting corrosion was identified in the original sample selection. Licensee procedural guidance for a Significance Level 3 adverse condition requires the reviewer to identify other potentially susceptible systems or components and fully explain the boundary for the extent of condition, but this was not done. This finding does not represent an immediate safety concern. The licensee entered the finding into their corrective action program as Callaway Action Request 201402168. This finding affected safety-related piping in which pitting was observed and repaired prior to being returned to service.

The licensee’s failure to perform an adequate extent of condition review of the pitting of the buried 24 inch refueling water storage tank piping in the essential core cooling system supply line is a performance deficiency. The performance deficiency is more than minor, and therefore a finding, because if left uncorrected, it has the potential to lead to a more significant safety concern if other welds on this same pipe render it susceptible to pitting corrosion in the weld heat affected zone. The finding affects the Mitigating System Cornerstone because the performance deficiency is related to the essential core cooling system’s ability to conduct short-term decay heat removal. The finding is of very low safety significance (Green) because the finding is not a design or qualification deficiency, did not result in the loss of operability or functionality of a single train for greater than the technical specification allowed outage time, and did not represent an actual loss of safety function for greater than 24 hours. This finding has a cross-cutting aspect in the conservative bias component of the human performance cross-cutting area because the licensee did not use conservative decision-making practices that emphasize prudent choices over those that are simply allowable.

Inspection Report# : [2014003](#) (*pdf*)

Significance:  Mar 28, 2014

Identified By: NRC

Item Type: NCV NonCited Violation

Inadequate Scaffold Procedure to Ensure Nearby Equipment is Not Impacted

The inspectors identified a non-cited violation of 10 CFR Part 50, Appendix B, Criterion V, “Instructions, Procedures, and Drawings,” for the licensee’s failure to provide an adequate procedure for construction and disassembly of scaffolding. Specifically, the licensee failed to ensure that nearby systems, structures, and components were not impacted during periods while scaffolding was being constructed and disassembled in their vicinity. The licensee documented this concern in Callaway Action Request 201400646 and immediately suspended any scaffold work until the procedure could be revised to ensure operability of adjacent equipment during construction and disassembly.

Failure to ensure that nearby systems, structures, and components were not impacted during periods when scaffolding

is being constructed or disassembled in their vicinity was a performance deficiency. This performance deficiency affected the Mitigating Systems Cornerstone and was more than minor because, if left uncorrected, it would have the potential to lead to a more significant safety concern because future scaffolds could impact the functionality of mitigating systems. The finding was determined to be of very low safety significance since the finding did not result in identifying any specific example of a loss of functionality of mitigating systems, structures, and components. This finding does not have a cross-cutting aspect because it did not represent current performance, since this procedure had been in effect since 2005.

Inspection Report# : [2014002](#) (*pdf*)

Significance: G Mar 28, 2014

Identified By: NRC

Item Type: NCV NonCited Violation

Failure to Implement Corrective Actions to Preclude Repetition

The inspectors identified a non-cited violation of 10 CFR Part 50, Appendix B, Criterion XVI, "Corrective Actions," involving the licensee's failure to prevent repetition of a significant condition adverse to quality. Specifically, the licensee failed to implement corrective actions to prevent repetition that were identified for a significant condition associated with the uncoupling of an essential service water system valves and their motor operator. The condition had been identified during similar failures in 1990 and 1993, but the planned corrective actions were never implemented. As a result, another service water valve failed in the same manner in 2012. This issue was entered into the licensee's corrective action program as Callaway Action Request 201401188. Corrective actions included updating the preventative maintenance instructions to include torque checks on the coupling bolts and verify all valves with similar couplings are checked by December 2014.

The inspectors determined the failure to prevent repetition of a significant condition adverse to quality was a performance deficiency. This performance deficiency was more than minor because it adversely affected the equipment performance attribute of the Mitigating Systems Cornerstone, and affected the cornerstone objective to ensure the availability, reliability, and capability of systems that respond to initiating events to prevent undesirable consequences. The inspectors assessed the finding in accordance with NRC Inspection Manual 0609, Appendix A, Exhibit 2, "Mitigating Systems Screening Questions," and determined the finding required a detailed risk evaluation because it involved the failure of a safety related valve (a single train) for longer than the technical specification allowed outage time. Therefore, a senior reactor analyst performed a bounding Phase 3 significance determination. The analyst determined that the finding was of very low safety significance (Green). The bounding change to the core damage frequency was approximately $4.5E-8$ /year. The dominant core damage sequences associated with the failed valve included losses of offsite power, failure of the redundant valve in the same train, random failures of the opposite train pump, failure to recover offsite power in 2 hours, and a consequential reactor coolant pump seal loss of coolant accident. Equipment that helped mitigated the risk included the redundant essential service water isolation valve in the same train as well as the auxiliary feedwater system and the steam generators. This finding did not have a cross-cutting aspect because the issue occurred in 1993 and is not indicative of current plant performance.

Inspection Report# : [2014002](#) (*pdf*)

Significance: G Dec 31, 2013

Identified By: NRC

Item Type: NCV NonCited Violation

Ultimate Heat Sink Cooling Tower - Incorrect Action Criteria in Control Room Evacuation Procedure

The inspectors identified a non-cited violation of Technical Specification 5.4.1(d), "Procedures," which states, in part, that written procedures shall be established, implemented, and maintained covering fire protection program implementation. Specifically, prior to October 10, 2013, Procedure OTO ZZ 00001, "Control Room Inaccessibility," Revision 38, steps D31 and D32, directed operators to use incorrect process indication and action criteria to diagnose and prevent icing conditions in the cooling tower after the control room was evacuated. This condition was entered

into the corrective action program as Callaway Action Request 201307709. As a result, the licensee revised the action criteria to direct the operators to take action to prevent icing in the cooling tower.

The inspectors determined that the failure of Procedure OTO ZZ 00001 to contain the appropriate criteria for operator action to control the ultimate heat sink cooling tower bypass valve after a control room evacuation was a performance deficiency. The inspectors determined that the performance deficiency was associated with the Mitigating Systems Cornerstone and was more than minor, and therefore a finding, because, if left uncorrected, it would have the potential to lead to a more significant safety concern. Specifically, the action criteria would not direct the operators to correctly diagnose, prevent, or mitigate icing in the ultimate heat sink cooling tower after a control room evacuation. Using NRC Manual Chapter 0609, Appendix F, "Fire Protection Significance Determination Process," the inspectors determined that the finding had very low safety significance (Green) because this finding would not have prevented the reactor from reaching and maintaining safe shutdown. This finding was not assigned a cross-cutting aspect because the most significant contributor was not reflective of current licensee performance.

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

Significance:  Dec 31, 2013

Identified By: NRC

Item Type: NCV NonCited Violation

Failure to Correct Non-conservative Safety Related Equipment Oil Leakage Criteria

The inspectors identified a non-cited violation of 10 CFR Part 50, Appendix B, Criterion XVI, "Corrective Action," for a failure to correct a condition adverse to quality. Specifically, the licensee's calculations to determine acceptable oil leak rates of safety related pumps in response to Callaway Action Requests 201102434 and 201207677 failed to ensure that the pumps' mission times could be met. As a result, non-conservative limits were added to Procedure ODP ZZ 0016E, Appendix 1, "Operations Technician General Inspection Guide." The licensee entered this issue into the corrective action program in Callaway Action Request 201308127. NRC inspectors determined there was never a time within the last several years when any of these pumps exceeded the revised oil leakage limits, once corrected.

The inspectors determined that the failure to correct non-conservative oil leakage specifications used in operator logs is a performance deficiency. The inspectors determined that the performance deficiency was associated with the Mitigating Systems Cornerstone and was more than minor, and therefore a finding, because, if left uncorrected, it would have the potential to lead to a more significant safety concern. Specifically, the failure to evaluate and determine appropriate lube oil leakage to maintain safety related equipment could have impacted the availability of mitigating systems if left uncorrected. The finding was assessed using Inspection Manual Chapter 0609, Appendix A, Exhibit 2, "Mitigating Systems Screening Questions," and was determined to be of very low safety significance since the inadequate specifications did not result in a loss of operability for the affected systems. This finding has a cross-cutting aspect in the decision-making component of the human performance cross-cutting area because the licensee failed to utilize a systematic process to ensure safety is maintained, specifically the authority and roles for decisions affecting nuclear safety in the corrective actions for Callaway Action Requests 201102434 and 201207677 were not formally defined resulting in inadequate engineering conclusions being incorporated into operations procedures.

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

Barrier Integrity

Significance:  Jun 30, 2014

Identified By: NRC

Item Type: FIN Finding

Plastic Shipping Plug in Rosemount Transmitter

The inspectors identified a finding for the licensee's failure to properly install a flow transmitter for the containment spray system. Specifically, since construction, Rosemount Transmitter ENFT0005, which provides a signal for containment spray train A pump flow rate, had a plastic shipping plug installed in the spare conduit port instead of the vendor-required stainless steel plug. The licensee did not include this transmitter as part of an operating experience extent of condition walkdown conducted in 2010 because the transmitter provides indication only and does not have an active safety function. However, the inspector determined that this transmitter provides operator post-accident monitoring capability of containment spray pump performance. The licensee entered this issue into the corrective action program as Callaway Action Request 201403300. The licensee reviewed this deficiency and determined that although Transmitter ENFT0005 was degraded, the containment spray system remained operable. The licensee promptly replaced the plastic shipping plug with the required stainless steel plug.

Failure to properly install a Rosemount transmitter needed for post-accident monitoring to its qualified configuration was a performance deficiency. This performance deficiency was more than minor, and therefore a finding, because it adversely affected the configuration control attribute and the Barrier Integrity Cornerstone objective to provide reasonable assurance that physical design barriers (i.e., containment) protect the public from radionuclide releases caused by accidents or events. Specifically, the improperly configured containment spray flow transmitter could have resulted in erratic spray flow indication, which could impede operators' ability to monitor this parameter and act upon the indication. The finding is of very low safety significance (Green) because containment spray is not a significant contributor to large early release frequency. This finding does not have a cross cutting aspect because the transmitter was installed in this manner during original construction and, thus, was not indicative of current licensee performance.

Inspection Report# : [2014003](#) (pdf)

Emergency Preparedness

Occupational Radiation Safety

Public Radiation Safety

Significance:  Dec 31, 2013

Identified By: Self-Revealing

Item Type: NCV NonCited Violation

Failure to Class and Describe a Radioactive Material Shipment Correctly and Failure to Include all Required Hazard Communication Information in a Radioactive Shipment Document

Inspectors reviewed a self-revealing non-cited violation of 10 CFR 71.5(a) because the licensee failed to class and describe a radioactive material shipment correctly and failed to include all required hazard communication information in a radioactive shipment document. The licensee entered this issue into the corrective action program as Callaway Action Request 201204454 and licensee representatives stated procedure guidance will be revised as a corrective action.

Failure to class and describe a radioactive material shipment correctly and to include all required hazard

communication information in accordance with federal hazardous material transportation regulations was a performance deficiency. The performance deficiency was determined to be more than minor because it was associated with the Public Radiation Safety Cornerstone attribute of program and process (transportation program) and adversely affected the associated cornerstone objective to ensure adequate protection of public health and safety from exposure to radioactive materials released into the public domain as a result of routine civilian nuclear reactor operation, in that it resulted in the incorrect identification and quantification of radioactive material transported in the public domain. Using Inspection Manual Chapter 0609 Appendix D, "Public Radiation Safety Significance Determination Process," dated February 12, 2008, the inspectors determined this to be of very low safety significance (Green) because the violation did not involve the radioactive effluent release program or the radiological environmental monitoring program, but the violation did involve the transportation of radioactive material. The violation was not (1) in excess of radiation limits, (2) a breach of package during transit, (3) a certificate of compliance issue, (4) a low-level burial ground noncompliance, or (5) a failure to make notifications or provide emergency information. The violation has a human performance cross-cutting aspect associated with licensee resources, in that the licensee had insufficient instruction in its shipping guidance to ensure package contents were verified.

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

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 : November 26, 2014