

Palo Verde 3

4Q/2015 Plant Inspection Findings

Initiating Events

Mitigating Systems

Significance: G Dec 31, 2015

Identified By: NRC

Item Type: NCV Non-Cited Violation

Failure to Adequately Assess Risk Prior to Performing Maintenance on ADV 178

DRAFT-The inspectors identified a non-cited violation of 10 CFR 50.65(a)(4) for the failure to adequately assess risk associated with an emergent maintenance activity on one of the atmospheric dump valves. Specifically, when the licensee developed the Technical Specification Limiting Condition for Operation 3.0.4.b risk assessment made to change modes from Mode 3 to Modes 2 and 1, they did not consider that the required repairs to the affected component, atmospheric dump valve (ADV) 178, would also require the removal of nitrogen from ADV 185 and the complete isolation of ADV 184. The licensee entered this issue into the corrective action program as CR 2015 10655 002.

The licensee's failure on May 3, 2015, to adequately assess the risk associated with performing corrective maintenance on ADV 178 was a performance deficiency. The performance deficiency is more than minor because it affected the configuration control attribute of the Mitigating Systems Cornerstone objective to ensure the availability, reliability, and capability of systems that respond to initiating events to prevent undesirable consequences, in that the performance deficiency resulted in the licensee operating Unit 3 in Mode 1 with multiple ADVs in the unit inoperable. The inspectors used NRC Manual Chapter 0609, Appendix K, "Maintenance Risk Assessment and Risk Management Significance Determination Process," Flowchart 1, to determine that the finding has very low safety significance because the incremental core damage probability deficit and the incremental large early release probability deficit used to evaluate the magnitude of the error in the licensee's inadequate risk assessment were less than 1E-6 and 1E-7, respectively. Because the primary reason for this performance deficiency was that after ADV 178 failed its partial-stroke test on May 2, the licensee's process for performing LCO 3.0.4b risk assessments did not include adequate instructions for identifying and managing risks before proceeding with the plant startup, this finding has a cross-cutting aspect in the human performance area of work management.

Inspection Report# : [2015004](#) (*pdf*)

Significance: G Dec 31, 2015

Identified By: Self-Revealing

Item Type: NCV Non-Cited Violation

Failure to Promptly Correct an Identified Condition Adverse to Quality on a Safety Related HPSI Pump 178

DRAFT-The inspectors reviewed a self-revealing, non-cited violation of 10 CFR Part 50, Appendix B, Criterion XVI, "Corrective Action" associated with the licensee not promptly correcting an apparent condition adverse to quality. Specifically, after a non-licensed operator (NLO) watch stander identified discolored lube oil in the High Pressure Safety Injection (HPSI) pump A motor outboard bearing, the licensee did not initiate a condition report, and therefore,

did not correct the associated condition, which was that the pump's outboard bearing had been damaged by an axially displaced pump shaft. Thirty-seven days later, technicians scheduled to perform planned maintenance on the pump properly identified and corrected that condition.

The licensee's failure to promptly correct a visually apparent condition adverse to quality identified during non-licensed operator shift rounds is a performance deficiency. That performance deficiency is more than minor because it affected the equipment reliability attribute of the Mitigating Systems Cornerstone objective to ensure the availability, reliability, and capability of systems that respond to initiating events to prevent undesirable consequences.

Specifically, this finding allowed a degraded pump motor to remain in service for 37 days. The inspectors used IMC 0609 Appendix A, Exhibit 2 Mitigating System Screening Question to determine that the finding was of very low safety significance (Green). Specifically, the finding screened to Green on question A.1 because a subsequent vendor analysis determined that the finding was a deficiency only affecting the design or qualification of a mitigating SSC, while the SSC remained operable. Because the primary cause of this finding involved the lack of a consistent, systematic approach to decide how to address conditions adverse to quality, this finding has a "consistent process" cross-cutting aspect in the area of human performance.

Inspection Report# : [2015004](#) (*pdf*)

Barrier Integrity

Emergency Preparedness

Occupational Radiation Safety

Public Radiation Safety

Security

Although the Security Cornerstone is included in the Reactor Oversight Process assessment program, the Commission has decided that specific information related to findings and performance indicators pertaining to the Security Cornerstone will not be publicly available to ensure that security information is not provided to a possible adversary. Other than the fact that a finding or performance indicator is Green or Greater-Than-Green, security related information will not be displayed on the public web page. Therefore, the [cover letters](#) to security inspection reports may be viewed.

Miscellaneous

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