

Diablo Canyon 1 2Q/2016 Plant Inspection Findings

Initiating Events

Significance: G Dec 31, 2015

Identified By: NRC

Item Type: NCV Non-Cited Violation

Failure to Properly Evaluate for Aggregate Impact of Fire Impairments

The inspectors identified a non-cited violation of Technical Specification 5.4.1.d, "Procedures," for the failure to follow approved fire protection program procedures to review the fire impairments list to assess the aggregate impact on the fire protection design and safe shutdown analysis. Specifically, from August 31 to September 2, 2015, the licensee failed to evaluate the aggregate impact of having three fire doors simultaneously blocked open in adjacent Unit 1 vital battery charger rooms. The licensee implemented immediate corrective actions by assigning a continuous fire watch to the area and documented the issue in the corrective action program as Notification 50826793.

The failure to follow approved fire protection program procedures to review the fire impairments list to assess the aggregate impact on the fire protection design and safe shutdown analysis was a performance deficiency. This performance deficiency was more than minor, and therefore a finding, because it was associated with the Initiating Events cornerstone attribute of Protection against External Factors (Fire) and adversely affected the cornerstone objective of limiting the likelihood of those events that upset plant stability and challenge critical safety functions during plant operations. Specifically, the failure to evaluate the aggregate impact of multiple fire system impairments affected the licensee ability to limit the impact of a potential fire. The inspectors evaluated the finding using IMC 0609, Attachment 4, "Phase 1–Initial Screening and Characterization of Findings." Because the finding involved fire protection, the inspectors transitioned to IMC 0609, Appendix F "Fire Protection Significance Determination Process." The inspectors characterized the finding using IMC 0609, Appendix F, Attachment 1, "Fire Protection SDP Phase 1 Worksheet," dated September 20, 2013. The finding screened as very low safety significance (Green), per Attachment 1, Question 1.4.3-A since the fire finding category was determined to be fire confinement, due to the fire doors being propped open, and the combustion loading on both sides of the door was determined to be a duration of 30 minutes as documented in licensee calculation M-824, "Controlled Combustion Loading Tracking." In addition, the inspectors determined this finding had a cross-cutting aspect in human performance associated with the teamwork component because the licensee's work groups did not properly communicate and coordinate their activities within and across organizational boundaries to ensure nuclear safety was maintained. Specifically, the work planners did not properly communicate to the fire protection department that all three fire doors would be open at the same time during battery charger load testing. [H.4]

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

Mitigating Systems

Significance: G Mar 31, 2016

Identified By: NRC

Item Type: NCV Non-Cited Violation

Failure to Verify Adequate Design Airflow for 480 volt AC Switchgear and 125 volt DC Inverter Rooms

The inspectors identified a non-cited violation of 10 CFR Part 50, Appendix B, Criterion III, “Design Control,” for the failure to verify the design adequacy of the safety-related ventilation system for the 480-volt AC switchgear and 125-volt DC inverter rooms. Specifically, the licensee failed to verify sufficient ventilation system airflow to ensure the temperature in rooms housing safety-related electrical equipment remained below 104 degrees Fahrenheit. The licensee’s corrective actions were documented in Notification 50840266.

The failure to provide design control measures to verify the adequacy of the 480-volt AC switchgear and 125-volt DC inverter rooms ventilation system design was a performance deficiency. The performance deficiency was more than minor because it was associated with the design control attribute of the Mitigating Systems Cornerstone 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 reduction in airflow to the rooms impacts the reliability of the safety-related equipment ventilation system to maintain the temperatures in these rooms below design limits for the duration of all accident scenarios. Using NRC Inspection Manual Chapter 0609, Appendix A, Exhibit 2, “Mitigating Systems Screening Questions,” the inspectors determined the finding was of very low safety significance because (1) the finding was not a deficiency affecting the design or qualification of a mitigating system; (2) the finding did not represent a loss of system and/or function; (3) the finding did not represent an actual loss of function of a single train for greater than its technical specification allowed outage time; and (4) the finding does not represent an actual loss of function of one or more non-technical specification trains of equipment designated as high safety-significant in accordance with the licensee’s maintenance rule program for greater than 24 hours.

The inspectors determined that this finding did not have a cross-cutting aspect because the most significant contributor of this finding occurred more than three years ago, and is therefore, not representative of current licensee performance.

Inspection Report# : [2016001](#) (pdf)

Significance:  Mar 10, 2016

Identified By: NRC

Item Type: NCV Non-Cited Violation

Failure to Evaluate 480 Vac Motor Starters with Circuit Breaker Trip Settings Higher than Manufacturers’ Specifications

The team identified a Green, non-cited violation of 10 CFR Part 50, Appendix B, Criterion III, “Design Control,” which states, in part, “The design control measures shall provide for verifying or checking the adequacy of design, such as by the use of alternate or simplified calculational methods, or by the performance of a suitable testing program.” Specifically, prior to September 10, 2013, the licensee failed to verify the design of 480 Vac combination motor starter instantaneous magnetic circuit breakers settings, by the use of alternate or simplified calculational methods, for those breakers whose settings are higher than their manufacturers’ specifications, as documented in calculation 195B-DC, “MCCB Settings for 460VAC Class 1E Motors,” to provide the required level of protection and ensure that certain failures that could be caused by sustained fault currents below the circuit breaker trip setting would not occur. In response to this finding, the licensee conducted a preliminary evaluation of some of the affected equipment and concluded that sustained fault currents below the trip settings are unlikely. This finding was entered into the licensee’s corrective action program as Notification 50838071.

The team determined the failure to evaluate 480 Vac combination motor starters with instantaneous magnetic circuit breaker trip current settings higher than their manufacturers’ specifications was a performance deficiency. The performance deficiency was more-than-minor, and therefore a finding, because it related to the design control attribute of the Mitigating Systems cornerstone objective of ensuring the availability, reliability, and capability of systems that respond to initiating events to prevent undesirable consequences. Specifically, improper motor starter breaker trip settings could result in a fire in the motor control center cubicle, damage to motor starter components, spurious tripping of the entire motor control center, or lack of protection for downstream components during fault conditions. In accordance with Inspection Manual Chapter 0609, Appendix A, “The Significance Determination Process (SDP)

for Findings At-Power,” dated July 19, 2012, the finding 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 causal factor of the performance deficiency did not reflect current licensee performance.

Inspection Report# : [2016007](#) (pdf)

Significance:  Mar 10, 2016

Identified By: NRC

Item Type: NCV Non-Cited Violation

Failure to Promptly Correct the Lack of Design Verification of 460 Vac Motors at Maximum Allowable Frequency

The team identified a Green, non-cited violation of 10 CFR Part 50, Appendix B, Criterion XVI, “Corrective Action,” which states, in part, “Measures shall be established to assure that conditions adverse to quality, such as failures, malfunctions, deficiencies, deviations, defective material and equipment, and nonconformances are promptly identified and corrected.” Specifically, prior to March 16, 2016, the licensee failed to assure that the lack of design verification of 460 Vac motors, which could be overloaded at the maximum allowable diesel generator frequency, was promptly corrected after having been identified in a 2013 apparent cause evaluation and again in a 2015 self-assessment as documented in Notifications 50572850 and 50826105, respectively. In response to this finding, the licensee performed a preliminary evaluation of the affected 460 Vac motors and concluded that operation at maximum emergency diesel generator frequency would not cause them to overheat or trip on overcurrent. This finding was entered into the licensee's corrective action program as Notifications 50835699 and 50838988.

The team determined the failure to correct the lack of design verification of 460 Vac motors at maximum allowable frequency when powered from the emergency diesel generators was a performance deficiency. The performance deficiency was more-than-minor, and therefore a finding, because it related to the design control attribute of the Mitigating Systems cornerstone objective of ensuring the availability, reliability, and capability of systems that respond to initiating events to prevent undesirable consequences. Specifically, operation of 460 Vac motors above their rated or analyzed maximum allowable frequencies could result in motor overheating or a trip of the thermal overload relays. In accordance with Inspection Manual Chapter 0609, Appendix A, “The Significance Determination Process (SDP) for Findings At-Power,” dated July 19, 2012, the finding 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 problem identification and resolution associated with evaluation because the licensee failed to ensure that the organization thoroughly evaluated issues to ensure that resolutions address causes and extent of conditions.

Inspection Report# : [2016007](#) (pdf)

Significance:  Mar 10, 2016

Identified By: NRC

Item Type: NCV Non-Cited Violation

Failure to Ensure Safety-Related Alternating Current and Direct Current Equipment Functionality at Maximum Allowable Voltages

The team identified a Green, non-cited violation of 10 CFR Part 50, Appendix B, Criterion III, “Design Control,” which states, in part, “The design control measures shall provide for verifying or checking the adequacy of design,

such as by the use of alternate or simplified calculational methods, or by the performance of a suitable testing program.” Specifically, prior to February 10, 2016, the licensee failed to verify the design of (1) equipment on the nominally 125 Vdc system at the maximum voltage specified in Procedure OP J-9:IV, “Performing a Battery Equalizing Charge,” and (2) equipment on 480 Vac and 120 Vac vital buses at maximum voltages specified in Procedure OP J-2:VIII, “Guidelines for Reliable Transmission Service for DCP,” by the use of alternate or simplified calculational methods, to ensure equipment functionality. In response to this finding, the licensee conducted a preliminary evaluation of the affected equipment and concluded that any past exposure to voltages above their maximum rating would not have caused a loss of functionality. This finding was entered into the licensee's corrective action program as Notifications 50834558, 50835906, 50835394, 50835945, 50835949, 50836376, 50836439, 50836638, 50836872, and 50836995.

The team determined the failure to evaluate operation of 125 Vdc and 480 and 120 Vac equipment at maximum allowable voltages was a performance deficiency. The performance deficiency was more-than-minor, and therefore a finding, because it related to the equipment performance attribute of the Mitigating Systems cornerstone objective of ensuring the availability, reliability, and capability of systems that respond to initiating events to prevent undesirable consequences. Specifically, operation of equipment outside of its rated or analyzed maximum allowable voltages adversely affects the reliability and capability of that equipment required to perform safety-related functions. In accordance with Inspection Manual Chapter 0609, Appendix A, “The Significance Determination Process (SDP) for Findings At-Power,” dated July 19, 2012, the finding 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 associated with design margins because the licensee failed to ensure that the organization operated and maintained equipment within design margins and that margins were carefully guarded and changed only through a systematic and rigorous process.

Inspection Report# : [2016007](#) (pdf)

Significance:  Mar 10, 2016

Identified By: NRC

Item Type: NCV Non-Cited Violation

Failure to Evaluate the Extent of Condition for a Degraded Condition on a Nonsafety-Related 4160 Vac Breaker

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, in October of 2015, the licensee failed to evaluate the extent of condition of a cracked holding pawl on a nonsafety-related 4160 Vac SF6 breaker, which was procured as safety-related, in accordance with Procedure OM7.ID1, “Problem Identification and Resolution,” when the failure of the component could adversely impact safety-related breakers of the same make and model. In response to this finding, the licensee is performing a procedure review to include steps to perform an extent of condition analysis for unplanned nonsafety-related equipment issues that may also affect similar safety-related equipment. This finding was entered into the licensee's corrective action program as Notifications 50836859 and 50836689.

The team determined the failure to evaluate the impact of a cracked holding pawl identified on a nonsafety-related 4160 Vac SF6 breaker on additional safety-related 4160 Vac SF6 breakers was a performance deficiency. The performance deficiency was more-than-minor, and therefore a finding, because it related to the equipment performance attribute of the Mitigating Systems cornerstone objective of ensuring the availability, reliability, and capability of systems that respond to initiating events to prevent undesirable consequences. Specifically, the 4160 Vac breaker with the cracked holding pawl was procured as safety-related; therefore, the condition extends to safety-

related 4160 Vac breakers of the same make and model and potentially adversely affects the ability to perform their safety function. In accordance with Inspection Manual Chapter 0609, Appendix A, “The Significance Determination Process (SDP) for Findings At-Power,” dated July 19, 2012, the finding 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 associated with conservative bias because the licensee failed to ensure that individuals used decision-making practices that emphasized prudent choices.

Inspection Report# : [2016007](#) (*pdf*)

Significance: G Mar 10, 2016

Identified By: NRC

Item Type: NCV Non-Cited Violation

Failure to Evaluate the Voltage Effects of Limiting Design Basis Events on the 230 kV Offsite Power Circuit

The team identified a Green, non-cited violation of 10 CFR Part 50, Appendix B, Criterion III, “Design Control,” which states, in part, “The design control measures shall provide for verifying or checking the adequacy of design, such as by the performance of design reviews, by the use of alternate or simplified calculational methods, or by the performance of a suitable testing program.” Specifically, prior to January 30, 2014, the licensee failed to verify the design of the 230 kV preferred offsite power source, such as by the performance of design reviews or use of alternate or simplified calculational methods, by assuming in calculation 359-DC, “Determination of 230 kV Grid Capability Limits as DCPD Offsite Power Source,” that the reactor trip and engineered safety features actuation system signals are coincident in time for all postulated design basis events. However, the plant is designed such that, during some events, the signals are separate in time and would result in a greater vital bus voltage depression than analyzed. In response to this finding, the licensee conducted a preliminary evaluation and concluded that the current transmission grid conditions were such that the calculation criteria would be met in the event of a design basis event involving non-coincident reactor trip and engineered safety features actuation system signals. This finding was entered into the licensee's corrective action program as Notification 50839137.

The team determined the failure to evaluate the voltage effects of a limiting design basis event with non-coincident reactor trip and engineered safety features actuation system signals on the 230 kV offsite power circuit was a performance deficiency. The performance deficiency was more-than-minor, and therefore a finding, because it related to the design control attribute of the Mitigating Systems cornerstone objective of ensuring the availability, reliability, and capability of systems that respond to initiating events to prevent undesirable consequences. Specifically, the failure to ensure adequate bus voltages as a result of a design basis event with non-coincident reactor trip and engineered safety features actuation system signals would result in a trip of the undervoltage relays and the loss of the preferred offsite power circuit. In accordance with Inspection Manual Chapter 0609, Appendix A, “The Significance Determination Process (SDP) for Findings At-Power,” dated July 19, 2012, the finding 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 associated with design margins because the licensee failed to ensure that the organization operated and maintained equipment within design margins and that margins were carefully guarded and changed only through a systematic and rigorous process.

Inspection Report# : [2016007](#) (*pdf*)

Significance: G Mar 10, 2016

Identified By: NRC

Item Type: NCV Non-Cited Violation

Failure to Translate Appropriate Load Tap Changer Timing Acceptance Criteria into Periodic Tests

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, "Instructions, procedures, or drawings shall include appropriate quantitative or qualitative acceptance criteria for determining that important activities have been satisfactorily accomplished." Specifically, prior to November 25, 2015, the licensee failed to include appropriate quantitative acceptance criteria in Procedure MP E-62.3, "Tap Changer Functional Test for Standby-Startup Transformer 11," to ensure that the load tap changer speed for standby-startup transformer 11 was adequate to restore vital bus voltages to the required level during design basis events. In response to this finding, the licensee performed a preliminary evaluation of the condition and concluded that the most recently measured speed of the load tap changer was adequate to ensure that it would restore vital bus voltage within the required time. This finding was entered into the licensee's corrective action program as Notification 50839333.

The team determined the failure to translate appropriate load tap changer timing acceptance criteria into functional tests to ensure that design assumptions were being maintained was a performance deficiency. The performance deficiency was more-than-minor, and therefore a finding, because it related to the design control attribute of the Mitigating Systems cornerstone objective of ensuring the availability, reliability, and capability of systems that respond to initiating events to prevent undesirable consequences. Specifically, the load tap changer could meet its functional test acceptance criterion, but not operate fast enough to restore vital bus voltages within the required time during design basis events, which would result in an undervoltage trip and loss of the preferred offsite power circuit. In accordance with Inspection Manual Chapter 0609, Appendix A, "The Significance Determination Process (SDP) for Findings At-Power," dated July 19, 2012, the finding 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 associated with design margins because the licensee failed to ensure that the organization operated and maintained equipment within design margins and that margins were carefully guarded and changed only through a systematic and rigorous process.

Inspection Report# : [2016007](#) (*pdf*)

Significance: G Dec 31, 2015

Identified By: Self-Revealing

Item Type: NCV Non-Cited Violation

Failure to Identify a Cause and Implement Actions to Prevent Recurrence of a Significant Condition Adverse to Quality

The inspectors reviewed a self-revealing non-cited violation of 10 CFR Part 50, Appendix B, Criterion XVI "Corrective Action," for the failure to identify the cause and take corrective action to prevent recurrence of a significant condition adverse to quality impacting both trains of the Unit 1 safety-related residual heat removal (RHR) system. Specifically, the licensee failed to identify a definitive cause and implement corrective actions to prevent recurrent failures of the socket weld for relief valve RHR-1-RV-8708 for both trains of the RHR system. As immediate corrective actions, the licensee installed additional piping supports to mitigate the vibrations at the socket weld and documented this issue in the corrective action program as Notification 50680750.

The failure to identify the cause of the RHR vibration-induced problems and to take adequate corrective actions to prevent recurrence of the weld failures was a performance deficiency. The performance deficiency was more than minor, and therefore a finding, because if left uncorrected, it could lead to a more significant safety concern.

Specifically, no additional supports were installed and no actions were taken to reduce or eliminate the vibrations to prevent recurring weld failures, which could affect the availability of the RHR system. The lack of corrective actions to prevent recurrence could leave RHR components and other components physically connected to the system susceptible to future failures. Using Inspection Manual Chapter 0609, Appendix A, the inspectors determined the issue to have very low safety significance (Green) because the performance deficiency, which affected the mitigating systems cornerstone, did not result in a loss of safety function and did not result in an actual loss of function for greater than the technical specification allowed outage time. The licensee entered this into their corrective action program as Notification 50680750. In addition, this finding has a cross-cutting aspect in the human performance area associated with conservative bias decision making component because individuals failed to use decision making practices that emphasize prudent choices over those that are simply allowable. Specifically, the licensee chose to only install a fatigue resistance weld rather than install additional pipe supports as were in the Unit 2 system [H.14].
Inspection Report# : [2015004](#) (pdf)

Significance:  Dec 31, 2015

Identified By: NRC

Item Type: NCV Non-Cited Violation

Failure to Design the Emergency Diesel Generators to operate under Worst Case Environmental Conditions

The inspectors identified a non-cited violation of 10 CFR Part 50, Appendix B, Criterion III "Design Control," for the failure to implement design control measures to verify the adequacy of the Unit 1 emergency diesel generators (EDGs) cooling system design to ensure operation of the EDGs under worst-case environmental conditions. Specifically, since initial licensed operations began in 1984, the licensee failed to ensure the Unit 1 EDGs were designed and built to operate under worst-case high wind and temperature conditions. As a result, sustained high winds from specific directions could have impacted EDG radiator performance resulting in the unavailability of the Unit 1 EDGs. Immediate corrective actions included issuing shift orders to the reactor operators to monitor for specific weather conditions (high air temperature, high wind speed and direction) and provide additional room cooling using established procedures, as necessary. The licensee documented the issue in the corrective action program as Notification 50599190.

The failure to implement design control measures to ensure the emergency diesel generators could perform their design basis function was a performance deficiency. The performance deficiency was more than minor, and is therefore a finding, because it was associated with the design control attribute of the mitigating system 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, the performance deficiency resulted in a condition where sustained high winds from specific directions could have impacted EDG radiator performance resulting in the unavailability of the Unit 1 EDGs. The inspectors evaluated the finding using Exhibit 2 of IMC 0609, Appendix A, "The Significance Determination Process for Findings At Power," dated June 19, 2012. The inspectors determined that a detailed risk evaluation by an NRC senior reactor analyst was required since the finding was associated with a loss of EDG function. The regional senior reactor analyst performed a Phase 3 SDP analysis for the finding. The results of analysis established the incremental conditional core damage probability (ICCDP) was 2.74E-07, less than 1E-06, and therefore the analyst determined that the subject finding was of very low safety significance (Green).

A cross-cutting aspect was not assigned to the finding since the finding did not represent current licensee performance. The condition existed since original construction of the plant.

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

Significance:  Sep 30, 2015

Identified By: NRC

Item Type: NCV Non-Cited Violation

Failure to Document an Adequate Evaluation for a Change in Seismic Load Combination Methodology

The inspectors identified a Severity Level IV, Green, non cited violation of 10 CFR 50.59(d)(1) which requires, in part, that the licensee shall maintain records of changes in the facility, of changes in procedures, and of tests and experiments made pursuant to paragraph (c) of this section. These records must include a written evaluation which provides the bases for the determination that the change, test, or experiment does not require a license amendment pursuant to paragraph (c)(2). Specifically, the licensee changed the method for combining earthquake loads and loss of coolant accident loads from the absolute summation method to square root sum of the squares (SRSS) method without sufficient justification to demonstrate the change did not require prior NRC approval.

The licensee's failure to implement the requirements of 10 CFR 50.59 and adequately evaluate changes to determine if prior NRC approval is required was a performance deficiency. The licensee entered the issue into the corrective action program as Notification 50811191. In accordance with the licensee's corrective action program, this issue will be addressed by the licensee through a re-evaluation of the methodology change and the required actions that need to be taken by the licensee will be implemented. Additionally, the licensee performed an operability determination for the affected structures, systems, and components that established a reasonable expectation for operability pending final resolution of the issue.

This performance deficiency was more than minor, and therefore a finding, because it was associated with the design control attribute of the Mitigating Systems cornerstone and adversely affected the cornerstone objective to ensure the reliability, availability, and capability of systems that respond to initiating events to prevent undesirable consequences. Specifically, the licensee failed to determine that use of SRSS in the Watts Bar safety evaluation report cited in the PG&E evaluation represented a change in a method of evaluation, in that the Watts Bar safety evaluation report was very narrow in scope and not appropriate for the intended application at Diablo Canyon. 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 result in the inoperability of the system. Because this performance deficiency had the potential to impact the NRC's ability to perform its regulatory function, the inspectors also evaluated the performance deficiency using traditional enforcement. Since the violation is associated with a Green finding having very low safety significance, the traditional enforcement violation was determined to be a Severity Level IV violation, consistent with the example in paragraph 6.1.d(2) of the NRC Enforcement Policy. This finding had a cross cutting aspect in the area of human performance associated with design margins because individuals failed to ensure margins were carefully guarded and changed only through a systematic and rigorous process [H.6].

Inspection Report# : [2015003](#) (pdf)

Barrier Integrity

Significance:  May 11, 2016

Identified By: NRC

Item Type: NCV Non-Cited Violation

Insufficient procedural direction contained within EOP E-2, Faulted Steam Generator Isolation

The examiners identified a non-cited violation of 10 CFR Part 50, Appendix B, Criterion V, "Instructions, Procedures, and Drawings." Specifically, Procedure EOP E-2, "Faulted Steam Generator Isolation," does not contain sufficient procedural direction for isolating auxiliary feedwater flow to a faulted steam generator in the event that auxiliary feedwater control valves cannot be closed from the control room. Procedure EOP E-2, Appendix HH, "Isolated Faulted Steam Generator," Step 1.d, and its associated column, Response Not Obtained, does not ensure that a faulted steam generator would remain isolated under all conditions. The Response Not Obtained column permits operators to either locally close auxiliary feedwater control valves OR secure the auxiliary feedwater pump feeding the faulted

steam generator. However, due to the absence of pull-to-lock or hard stop switches for the auxiliary feedwater pumps, the possibility exists for an automatic restart of an auxiliary feedwater pump and a re-initiation of feedwater to a faulted steam generator.

The failure to ensure that Procedure EOP E-2 contained sufficient direction to isolate a faulted steam generator when auxiliary feedwater flow control valves cannot be closed from the control room was a performance deficiency. This performance deficiency was of more than minor safety significance because it was associated with the procedure quality attribute of the Barrier Integrity cornerstone (reactor coolant system and containment) and adversely affected the cornerstone objective of providing reasonable assurance that physical design barriers protect the public from radionuclide releases caused by accidents or events. Specifically, the re-initiation of feedwater to an isolated, faulted steam generator has the potential to adversely affect the reactor coolant system barrier by causing an additional unintended cooldown of the reactor coolant system, increased potential for pressurized thermal shock, and thermal stress to the steam generator u-tubes. Additionally, the containment barrier would be affected by the re-initiation of feedwater to a steam line break within containment. Using Inspection Manual Chapter 0609, Appendix A, "The Significance Determination Process (SDP) for Findings At-Power," dated June 19, 2012, the team determined that the finding required a detailed risk evaluation due to the potential to affect the reactor coolant system boundary. A senior reactor analyst performed a bounding detailed risk evaluation and estimated the maximum increase in core damage frequency to be 5.9E-8/year, and therefore the finding was determined to be of very low safety significance (Green). This increase in core damage frequency was mitigated by the low probability of multiple equipment failures in the auxiliary feedwater system when combined with the low initiating event frequency of a faulted steam generator. Because the violation was of very low safety significance (Green) and the issue was entered into the licensee's corrective action program as Notification 50847218, this violation is being treated as a non-cited violation consistent with Section 2.3.2.a of the Enforcement Policy: NCV 05000275/2016301; 05000323/2016301-01, "Insufficient Procedural Direction Contained Within E-2, Faulted Steam Generator Isolation." This finding has a cross-cutting aspect in the area of human performance associated with resources because the organization did not ensure procedures are available and adequate to support nuclear safety.

Inspection Report# : [2016301](#) (*pdf*)

Emergency Preparedness

Occupational Radiation Safety

Significance:  Sep 30, 2015

Identified By: Self-Revealing

Item Type: NCV Non-Cited Violation

Failure to Secure a Locked High Radiation Area

The inspectors reviewed a self-revealing non-cited violation (NCV) of Technical Specification 5.4.1(a), "Procedures," for failure to secure a locked high radiation area. Specifically, the padlock on the Letdown Filter 1-1 locking bar was found unlocked. Upon discovery, the licensee guarded the area until properly secured. This issue was entered into the licensee's corrective action program as Notification 50710852.

The failure to secure a locked high radiation area was a performance deficiency. The performance deficiency was more than minor because, if left uncorrected, it had the potential to lead to a more significant safety concern. Specifically, failure to adequately secure the locked high radiation area could result in unintended exposure to high levels of radiation. Using Inspection Manual Chapter 0609, Appendix C, "Occupational Radiation Safety Significance

Determination Process,” dated August 19, 2008, the inspectors determined the violation was of very low safety significance (Green) because: (1) it was not an as low as reasonably achievable (ALARA) finding, (2) there was no overexposure, (3) there was no substantial potential for an overexposure, and (4) the ability to assess dose was not compromised. The finding had an avoid complacency cross-cutting aspect, in the area of human performance, because individuals failed to recognize and plan for the possibility of mistakes, even while expecting positive outcomes. Specifically, licensee personnel failed to ensure that the padlock was secured after completing the task [H.12].
Inspection Report# : [2015003](#) (*pdf*)

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, 2016