

Nine Mile Point 1 3Q/2016 Plant Inspection Findings

Initiating Events

Mitigating Systems

Significance: G Mar 31, 2016

Identified By: NRC

Item Type: NCV Non-Cited Violation

Inadequate Tagout Results in Reactor Building Closed-Loop Cooling Drain Down Event

A self-revealing Green non-cited violation of Technical Specification (TS) 6.4.1, "Procedures," was identified when a Unit 1 Exelon operator did not maintain proper configuration control of a plant system during a system tagout for planned maintenance. Specifically, on January 25, 2016, a Unit 1 non-licensed operator manipulated a reactor building closed-loop cooling (RBCLC) system drain valve out of sequence while performing a tagout for the #13 shutdown cooling heat exchanger for planned maintenance. This resulted in unintentional draining of the operating RBCLC system, multiple alarms to annunciate in the main control room, and operators entering abnormal operating procedures to recover the RBCLC system. As part of corrective actions, proper configuration was promptly restored, the operator involved in the event was given a remediation plan for requalification and placed on an operations excellence plan.

This finding is more than minor because it is associated with the configuration control attribute of the Mitigating Systems cornerstone and adversely affected the associated cornerstone objective to ensure the availability, reliability, and capability of systems that respond to initiating events to prevent undesirable consequences; and if left uncorrected, the event had potential to lead to a more significant safety concern. Specifically, the failure to quickly isolate the drain down of the RBCLC system would have required a manual reactor scram, a manual trip of all five reactor recirculation pumps, a manual isolation of the reactor water cleanup system, a loss of cooling to the spent fuel pool cooling system, instrument air compressors, and the control room emergency ventilation system. The inspectors evaluated the finding using IMC 0609.04, "Initial Characterization of Findings," and Exhibit 1 of IMC 0609, Appendix A, "The Significance Determination Process for Findings At-Power." The inspectors determined that this finding was of very low safety significance (Green) because the performance deficiency did not result in the loss of a support system, RBCLC, or affect mitigation equipment. This finding has a cross-cutting aspect in the area of Human Performance, Procedure Adherence, because the non-licensed operator failed to follow the license's procedures and the instructions of the pre job brief stop when manipulating the drain valve. Specifically, the non-licensed operator rationalized, without being the designated performer of the tagout, that it was acceptable to perform a valve manipulation out of sequence with the tagout plan.

Inspection Report# : [2016001](#) (*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.

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Miscellaneous

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