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Clinton – Quarterly Plant Inspection Findings

2Q/2017 – Plant Inspection Findings

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Initiating Events

Significance: G Mar 31, 2017

Identified By: Self-Revealing

Item Type: NCV Non-Cited Violation

FAILURE TO DEVELOP AND REVIEW A WORKER TAG OUT

The inspectors documented a self-revealed finding of very low safety significance and associated non-cited violation of Technical Specification 5.4.1, "Procedures," for the licensee's failure to develop and review a worker tag out in accordance with station procedure OP-AA-109-10, "Clearance and Tagging," Revision 12. Specifically, the licensee failed to identify the effect of a worker tag out on the in-service steam jet air ejector suction valve, which caused condenser vacuum to degrade resulting in the operators entering the off normal procedure for loss of condenser vacuum. The licensee entered this issue into their corrective action program as action request (AR) 03980495. As corrective actions, the operations department issued a standing order to require worker tag outs to be challenged by a second senior reactor operator.

The performance deficiency was determined to be more than minor because it impacted the Initiating Events cornerstone attribute of configuration control and adversely affected the cornerstone objective of limiting the likelihood of events that upset plant stability and challenge critical safety functions during power operations. Specifically, the failure to properly develop the worker tag out caused the condenser vacuum to degrade, challenging the operators to quickly diagnose the issue and take action to avoid a turbine trip. The finding was screened against the Initiating Events cornerstone and determined to be of very low safety significance because it did not cause a reactor trip or the loss of mitigation equipment relied upon to transition the plant from the onset of a trip to a stable shutdown condition. The inspectors determined that this finding affected the cross-cutting area of human performance in the aspect of avoid complacency, where individuals recognize and plan for the possibility of mistakes, latent issues, and inherent risk, even while expecting successful outcomes. Individuals implement appropriate error reductions tools. Specifically, the operations department failed to implement appropriate error reduction tools such as questioning attitude and thorough work product reviews to ensure the worker tag out considered all potential effects to other plant equipment. [H.12]

Inspection Report# : 2017001 (*pdf*)

Significance: **G** Sep 30, 2016

Identified By: Self-Revealing

Item Type: NCV Non-Cited Violation

Failure to Prevent Recurrence of a Significant Condition Adverse to Quality

The inspectors documented a self-revealing finding of very low safety significance and an NCV of 10 CFR 50, Appendix B, Criterion XVI for the licensee's failure to take corrective action to preclude repetition of a significant condition adverse to quality (SCAQ). After identifying IGSCC on main steam flex hoses in 2007 and concluding the leakage constituted a SCAQ, the licensee's corrective actions to prevent recurrence failed to prevent pressure boundary leakage at the same location in 2016. The licensee entered this issue into their corrective action program as AR 02670593. The affected hoses were replaced. The licensee is also developing a design change to address at least one of the three factors that contributes to IGSCC.

The inspectors determined that the licensee's failure to take corrective actions to prevent recurrence of an SCAQ was a performance deficiency and more than minor because if left uncorrected pressure boundary leakage could become a more significant concern. Specifically, pressure boundary leakage is not allowed by TS and any leakage requires the plant to be shutdown. The finding was screened as low safety significant because it did not result in exceeding the RCS leak rate for a small LOCA and did not affect systems used to mitigate a LOCA. No cross cutting aspect was assigned as the original issue occurred greater than three years ago and was not reflective of current performance.

Inspection Report# : 2016003 (*pdf*)

Mitigating Systems

Significance: **G** Apr 21, 2017

Identified By: NRC

Item Type: NCV Non-Cited Violation

Failure to Perform Required Surveillances on Multiple Fire Dampers (Section 1R05.2b)

Green. The inspectors identified a finding of very-low safety significance (Green), and an associated Non-Cited Violation of License Condition 2.C(f) for the licensee's failure to adequately implement surveillance procedures and work processes associated with fire barrier damper inspections. Specifically, the licensee failed to perform fire barrier damper inspections for 15 fire dampers once every 48 months (plus an additional 25 percent grace period) as required by the Fire Protection Program. The licensee entered the issue into their Corrective Action Program, and will inspect the fire barrier dampers during the next refueling outage.

The inspectors determined that the performance deficiency was more-than-minor because the licensee's failure to inspect the fire barrier dampers could result in not identifying degraded dampers which could affect their ability to prevent a fire from spreading from one fire area to another. The finding was of very-low safety significance because the failure to inspect the fire barrier dampers did not impact the plant's ability to reach and maintain safe-shutdown. The finding has a cross-cutting aspect in the area of Human Performance, Work Management because the licensee failed to execute a work order to inspect the fire dampers in accordance with the required frequency in Procedure CPS 9601.01 and instead improperly extended the frequency of the fire damper inspections. (Section 1R05.2b) [H.5]

Inspection Report# : 2017008 (*pdf*)

Significance: **G** Mar 31, 2017

Identified By: NRC

Item Type: NCV Non-Cited Violation

PLANT BARRIER CONTROL PROGRAM FAILED TO COMPENSATE FOR AN IMPACTED FLOOD BARRIER

The inspectors identified a finding of very low safety significance and an associated non-cited violation of Title 10 of the Code of Federal Regulations (CFR) Part 50, Appendix B, Criterion V, "Instructions, Procedures, and Drawings," for the failure to implement the plant barrier control program for an impacted flood barrier. Specifically, the plant barrier impairment (PBI) permit, PBI-2017-02-003, for work on watertight door 1SD1-24, failed to identify the door as a flood barrier and that appropriate compensatory measures for 1SD1-24 being open for an extended period were identified or implemented in accordance with station procedure CC-AA-201, "Plant Barrier Control Program," Revision 11. The licensee entered this issue into their corrective action program as AR 03980495. The corrective actions in response to this violation were to identify appropriate compensatory measures for impairment of 1SD1-24 and incorporate them into the PBI log.

The performance deficiency was determined to be more than minor because it impacted the Mitigating Systems cornerstone attribute of protection against external events and adversely affected the cornerstone objective of ensuring the availability, reliability and capability of systems that respond to initiating events to prevent undesirable consequences. With the flood barrier nonfunctional and without compensatory actions in place the residual heat removal (RHR) 'B' and RHR 'C' pumps were inoperable. The finding was screened against the Mitigating Systems cornerstone and the inspectors determined that the finding involved the loss or degradation of equipment or function specifically designated to mitigate a seismic, flooding or severe weather initiating event. The inspectors determined that the loss of this equipment or function by itself during the external initiating event would degrade one or more trains of a system that supports a risk significant system or function and would require a detailed risk evaluation. The senior reactor analyst (SRA) performed the detailed risk evaluation and concluded the finding was of very low safety significance. The inspectors determined that this finding affected the cross-cutting area of human performance in the aspect of conservative bias, where individuals use decision making practices that emphasize prudent choices over those that are simply allowable. Proposed actions are determined to be safe in order to proceed, rather than unsafe in order to stop. Specifically, during preparation of the PBI permit, the station PBI log was reviewed and actions for previous work associated with the watertight door were deemed acceptable even though the work on the door in those instances was different than the work being performed this time. [H.14]

Inspection Report# : 2017001 (*pdf*)

Significance:  Mar 31, 2017

Identified By: NRC

Item Type: NCV Non-Cited Violation

FAILED TO VERIFY AN APPROPRIATE ALTERNATE METHOD OF DECAY HEAT REMOVAL

The inspectors identified a finding of very low safety significance and an associated non-cited violation of 10 CFR 50.36(c)(2)(i), "Limiting conditions for operation", for failing to meet/follow the required actions for limiting condition for operation 3.9.9 and 3.4.10. Specifically, the operators failed to verify a credited alternate decay heat removal method that would satisfy the required action for the limiting condition for operation. The licensee entered this issue into their corrective action program as AR 03987440. The corrective actions in response to this violation were to identify appropriate alternate methods of decay heat removal and incorporate them into the shutdown safety management program utilized during plant outages.

The performance deficiency was determined to be more than minor because it impacted the Mitigating Systems cornerstone attribute of equipment performance and adversely affected the cornerstone objective of ensuring the availability, reliability and capability of systems that respond to initiating events to prevent undesirable consequences. Specifically, with the operators failing to identify a credited alternate method of decay heat removal and taking credit for the inoperable but in service RHR shutdown cooling train, the actual available methods that could have been credited were not verified to ensure their availability to provide the required function. The finding was screened against the Mitigating Systems Screening questions and determined to be of very low safety significance because the answer to all of the applicable screening questions was "No." The inspectors determined that this finding affected the cross-cutting area of human performance in the aspect of conservative bias, where individuals use decision making practices

that emphasize prudent choices over those that are simply allowable. Proposed actions are determined to be safe in order to proceed, rather than unsafe in order to stop. Specifically, the senior reactor operators at the station had historically credited inoperable RHR shutdown cooling subsystems as their own alternate decay heat remove method because they believed it was allowable without determining that it was safe in order to proceed. [H.14]

Inspection Report# : 2017001 (*pdf*)

Significance:  Mar 31, 2017

Identified By: Self-Revealing

Item Type: NCV Non-Cited Violation

FAILURE TO PERFORM MAINTENANCE ON RESIDUAL HEAT REMOVAL PUMP 'C' BREAKER IN ACCORDANCE WITH PROCEDURES

The inspectors documented a self-revealed finding of very low safety significance and associated non-cited violation of 10 CFR Part 50, Appendix B, Criterion V, "Instructions, Procedures and Drawings," for the licensee's failure to perform maintenance on a safety related breaker in accordance with station procedure Clinton Power Station (CPS) 8410.12C001, "Westinghouse DHP Circuit Breaker Checklist," Revision 7. Specifically, the licensee failed to ensure the remaining travel on the latch check switch for the RHR 'C' pump breaker was within the acceptable range resulting in the RHR 'C' pump failing to start. The licensee entered this issue into their corrective action program as AR 03949655. The corrective actions taken by the licensee included providing coaching to the involved individuals as well as changing the procedure to include a block to record the latch check switch over travel.

The performance deficiency was determined to be more than minor because it impacted the Mitigating Systems cornerstone attribute of equipment performance and adversely affected the cornerstone objective of ensuring the availability, capability, and reliability of equipment that responds to initiating events. Specifically, the performance deficiency adversely impacted the operability of the RHR 'C' pump. The inspectors reviewed the Mitigating Systems screening questions and determined a detailed risk evaluation was required because question A.3 was answered yes. The SRA performed the detailed risk evaluation and concluded the finding was of very low safety significance. The inspectors determined that this finding affected the cross-cutting area of human performance in the aspect of resources, where leaders ensure that personnel, equipment, procedures, and other resources are available and adequate to support nuclear safety. Specifically, the organization failed to ensure the procedure step included a block for recording the latch check switch over travel value, which led to confusion on whether the value was required to be recorded and ultimately resulted in a failure to perform the step as written. [H.1]

Inspection Report# : 2017001 (*pdf*)

Significance:  Dec 31, 2016

Identified By: NRC

Item Type: NCV Non-Cited Violation

Failure to Demonstrate the Condition or Flood Seals was being Effectively Controlled

The inspectors identified a finding of very low safety significance and an associated non-cited violation of 10 CFR 50.65(a)(2), "Requirements for Monitoring the Effectiveness of Maintenance at Nuclear Power Plants," for the licensee's failure to demonstrate that the condition of flood seals was being effectively controlled through appropriate preventive maintenance such that the flood seals remained capable of performing their intended function. Specifically, the licensee failed to visually inspect flood seals per ER-AA-450, "Structures Monitoring" and ER-CL-450-1007, "Clinton Surveillance Inspection Program for Seals." As corrective actions, the licensee planned to visually inspect all accessible flood seals and generate an evaluation for inaccessible seals. In addition, the licensee planned to modify ER-AA-450 to clarify the frequency of flood seal inspection.

The inspectors determined the licensee's failure to demonstrate that the condition of flood seals was being effectively

controlled by visual inspection, per ER-AA-450 and ER-CL-450-1007, was a performance deficiency. The performance deficiency was determined to be more than minor in accordance with IMC 0612, "Power Reactor Inspection Reports," Appendix B, "Issue Screening," dated September 7, 2012, because it was associated with the equipment performance attribute of the Mitigating Systems cornerstone and adversely affected the cornerstone objective of ensuring the availability, reliability, and capability of systems that respond to initiating events to prevent undesirable consequences. Specifically, failure to monitor the condition of the flood seals in a manner sufficient to provide reasonable assurance they were capable of fulfilling the intended safety functions could adversely affect multiple mitigating systems in the event of a flood or line break. Using IMC 0609, Attachment 4, "Initial Characterization of Findings," issued October 7, 2016, and Appendix A, "The Significance Determination Process for Findings at Power," issued June 19, 2012, the finding was screened against the Mitigating Systems cornerstone and determined to be of very low safety significance because the inspectors answered no to the question "does the finding involve the loss or degradation of equipment or function specifically designed to mitigate a seismic, flooding, or severe weather initiating event?" The inspectors determined this finding affected the cross-cutting area of Problem Identification and Resolution, in the aspect of identification, where 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. Specifically, the licensee failed to identify the flood seals still had not been inspected when they performed the Maintenance Rule Program - Structures Monitoring Assessment which credited ER-CL-450-1007 in early 2014.

Inspection Report# : 2016004 (*pdf*)

Significance:  Dec 01, 2016

Identified By: NRC

Item Type: NCV Non-Cited Violation

Failure to Promptly Identify that the Incapability of the RHR Design to Support TS Operability Requirements Was a CAQ (Section 40A2.b(1))

Green: The team identified a finding of very-low safety significance (Green) and an associated NCV of Title 10 of the Code of Federal Regulations (CFR), Part 50, Appendix B, Criterion XVI, "Corrective Action," for the licensee failure to promptly identify that the incapability of the residual heat removal (RHR) design to support Technical Specifications (TS) operability requirements was a condition adverse to quality. Specifically, when reactor water temperature was greater than 150 degrees Fahrenheit, RHR could not be realigned from shutdown cooling mode of operations to provide the TS required functions of the emergency core cooling system, suppression pool cooling, containment spray, and feedwater leakage control system. The licensee captured this issue in their Corrective Action Program (CAP) as Action Request (AR) 02742439 and AR 03948042, and planned to submit a License Amendment Request to align TS requirements with the design capabilities.

The performance deficiency was determined to be more-than-minor because it was associated with the Mitigating Systems cornerstone attribute of design control and adversely affected the associated cornerstone objective of ensuring the availability, reliability, and capability of systems that respond to initiating events to prevent undesirable consequences. Specifically, the performance deficiency resulted in voluntarily declaring TS functions inoperable when performing shutdown cooling operations, which did not ensure the associated mitigating systems availability or capability to respond to an initiating event. The team determined that this finding was of very low safety significance (Green). Specifically, there were no known instances where the finding: (1) represented a loss of system safety function; (2) represented an actual loss of safety function of at least a single train or two separate safety systems out of service for greater than their TS allowed outage time; (3) involved non-TS trains of equipment; (4) involved a degradation of a functional RHR auto-isolation on low reactor vessel level; (5) impacted external event protection; or (6) involved fire brigade issues. The team did not identify a cross cutting aspect associated with this finding because it did not reflect current licensee performance since the performance deficiency occurred more than 3 years ago. (Section 40A2.b(1))

Inspection Report# : 2016009 (*pdf*)

Significance:  Sep 30, 2016

Identified By: NRC

Item Type: NCV Non-Cited Violation

Exceeded Technical Specification Allowed Outage Time for Main Turbine Bypass System

The inspectors identified a finding of very low safety significance and an associated NCV of Technical Specification 3.7.6, "Main Turbine Bypass System" for the licensee's failure to meet the limiting conditions for operation and complete the associated required actions after making a deficient change to the turbine bypass valve surveillance testing frequency. Specifically, with the main turbine bypass system inoperable and without the Core Operating Limits Report (COLR) limits for thermal power, minimum critical power ratio (MCPR), and linear heat generation rate (LGHR) with the main turbine by pass system inoperable applied, thermal power was not reduced to less than 21.6 percent of rated thermal power within six hours. The licensee entered this issue into their corrective action program as AR 02690657. The licensee restored compliance by applying the COLR limits for reactor thermal power, MCPR and LGHR.

The inspectors determined the failure to meet the limiting conditions for operation and complete the associated required actions prior to the end of the specified completion times was a performance deficiency. The performance deficiency was more than minor because it was associated with the equipment performance attribute of the Mitigating Systems cornerstone and adversely affected the cornerstone objective of ensuring the availability, reliability, and capability of systems that respond to initiating events to prevent undesirable consequences. The finding was screened against the Mitigating Systems cornerstone and determined to be of very low safety significance because all of the associated questions in IMC 0609, Appendix A, were answered no. The inspectors determined this finding affected the cross-cutting area of human performance, in the aspect of change management, where leaders use a systematic process for evaluating and implementing change so that nuclear safety remains the overriding priority because the licensee's change management process was not fully utilized by senior management when evaluating and implementing a change to the turbine bypass valve surveillance testing frequency. (H.3)

Inspection Report# : 2016003 (*pdf*)

Significance:  Sep 30, 2016

Identified By: NRC

Item Type: NCV Non-Cited Violation

Failure to Perform a 50.59 Screening for Changing the Frequency of Exercising the Turbine Bypass Valves

The inspectors identified a Severity Level IV NCV of 10 CFR 50.59 4(d)(1), "Changes, Tests, and Experiments," and an associated Green finding for the licensee's failure to perform a written evaluation which provided the bases for determining that changing the turbine bypass valve surveillance testing frequency from every 31 days, as specified in the Updated Safety Analysis Report, to once a year did not require a license amendment. The licensee has entered this issue into their corrective action program as AR 02720163. The licensee is currently evaluating the issue in accordance with their procedure for changes to the facility.

The inspectors determined that the licensee's failure to perform a written evaluation to provide the basis for the determination that a change to the facility, a change to a procedure, or a change to a test or experiment did not require a license amendment was a performance deficiency. The performance deficiency was more than minor in accordance with IMC 0612, "Power Reactor Inspection Reports," Appendix B, "Issue Screening," dated September 7, 2012, because, it was associated with the procedure quality attribute of the Mitigating Systems cornerstone and adversely affected the cornerstone objective of ensuring the availability, reliability, and capability of systems that respond to initiating events to prevent undesirable consequences. Using IMC 0609, Attachment 4, "Initial Characterization of

Findings," and Appendix A, "The Significance Determination Process for Findings At-Power," issued June 19, 2012, the finding was screened against the Mitigating Systems cornerstone and determined to be of very low safety significance because all of the associated questions in IMC 0609, Appendix A, were answered no. Violations of 10 CFR 50.59 are dispositioned using the traditional enforcement process because they are considered to be violations that potentially impede or impact the regulatory process. The inspectors reviewed Section 6.1.d.2 of the NRC Enforcement Policy and determined this violation was Severity Level IV because the resulting changes were evaluated by the SDP as having very low safety significance. The inspectors determined this finding affected the cross-cutting area of human performance, in the aspect of consistent process, where individuals use a consistent, systematic approach to make decisions. The licensee made a decision to proceed with implementation of a change to the turbine bypass valve surveillance testing frequency after a plant oversight committee review in lieu of following their consistent, systematic process for evaluating changes to the USAR. (H.13)

Inspection Report# : 2016003 (*pdf*)

Significance:  Aug 09, 2016

Identified By: NRC

Item Type: FIN Finding

Failure to have hose configurations that were verified to be able to ensure a timely and successful implementation of a FLEX strategy

Green. Two examples of a finding of very low safety significance was identified by the inspectors for the licensee's failure to have hose configurations that were verified to be able to ensure a timely and successful implementation of a flexible response (FLEX) strategy. Specifically, the licensee did not ensure through evaluations, calculations, analyses or any other means that the strategy for maintaining core cooling, containment heat removal and Spent Fuel Pool (SFP) cooling during a Beyond-Design-Basis External Event (BDBEE) flooding scenario would be capable of fulfilling its function. No violation of NRC requirements were identified.

The performance deficiency is more than minor because it was associated with the mitigating systems cornerstone objective attribute of protection against external factors, specifically the BDBEE flood hazard, and it adversely affected the cornerstone attribute of ensuring the availability, reliability and capability of systems that respond to initiating events to prevent undesirable consequences. Issues identified through TI-191 are evaluated through a cross-regional panel using IMC 0609, Appendix M, "Significance Determination Process Using Qualitative Criteria," as informed by draft Appendix O, "Post Fukushima Mitigation Strategies Significance Determination Process." The finding was determined to be of very low safety significance (Green). The inspectors concluded that the cause of the finding involved a cross-cutting component in the Human Performance area of Design Margins because the organization did not ensure the selected strategy contained the required verification that it could be successfully implemented. [H.6]

Inspection Report# : 2016007 (*pdf*)

Barrier Integrity

Significance:  Dec 01, 2016

Identified By: NRC

Item Type: NCV Non-Cited Violation

Non Conservative Control Room Radiological Habitability Assessment (Section 1R21.3.b(1))

Green. The team identified a finding of very-low safety significance (Green) and an associated NCV of 10 CFR Part 50, Appendix B, Criterion III, "Design Control," for the licensee failure to use a technically appropriate analytical methodology in the control room radiological habitability calculation. Specifically, the licensee used a methodology that inappropriately characterized the control room heating, ventilation and air conditioning (HVAC) system outside air

intake design resulting in a calculated control room dose following a loss of coolant accident that exceeded the applicable limit. The licensee captured this issue in their CAP as AR 02742442, completed an operability evaluation, and issued an NRC event notification.

The performance deficiency was determined to be more-than-minor because it was associated with the Barrier Integrity cornerstone attribute of design control and 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 performance deficiency resulted in the control room expected dose following a loss of coolant accident to exceed the applicable limits prompting an operability evaluation. The finding screened as of very-low safety significance (Green) because it only represented a degradation of the radiological barrier function provided for the control room. Specifically, the finding did not affect the control room barrier function against smoke or a toxic atmosphere. The team did not identify a cross-cutting aspect associated with this finding because it was not confirmed to reflect current performance due to the age of the performance deficiency. Specifically, the affected calculations were performed more than 3 years ago. (Section 1R21.3.b(1))

Inspection Report# : 2016009 (*pdf*)

Significance:  Dec 01, 2016

Identified By: NRC

Item Type: NCV Non-Cited Violation

Failure to Scope SFP Temperature and Level Instruments into the Maintenance Rule Program (Section 1R21.3.b(2))

Green. The team identified a finding of very-low safety significance (Green) and an associated NCV of Paragraph (b) (2)(i) of 10 CFR 50.65, "Requirements for Monitoring the Effectiveness of Maintenance at Nuclear Power Plants," for the licensee failure to scope non-safety related mitigating structure, systems, and components (SSCs) used within an emergency operating procedure (EOP) into Maintenance Rule Program. Specifically, an EOP used spent fuel pool (SFP) low-level and high-temperature parameters as distinct entry criteria but the associated components were not included in the scope of the Maintenance Rule Program. The licensee captured the team concerns in their CAP as AR 02736193, performed an extent of condition to identify any other SSC addition to the EOPs requiring them to be added to the Maintenance Rule Program scope, and initiated plans to incorporate the affected SSCs into the Maintenance Rule Program scope.

The performance deficiency was determined to be more-than-minor because it was associated with the Barrier Integrity cornerstone attribute of SSC performance and affected the cornerstone objective of providing reasonable assurance that physical design barriers protect the public from radionuclide releases caused by accidents or events. Specifically, a key aspect of the Maintenance Rule is to ensure that maintenance activities are performed in a manner that provide reasonable assurance that SSCs within its scope perform reliably and are capable of providing their intended Maintenance Rule function(s). In the case of the SFP temperature instruments, the licensee was not performing preventive maintenance to ensure that degradation, such as instrument drift, did not adversely affect their ability to detect and alarm EOP entry conditions such that mitigating actions could be implemented to preserve secondary containment. The finding screened as of very-low safety significance (Green) because it only represented a degradation of the radiological barrier function provided for the control room. Specifically, the finding did not cause SFP temperature to exceed the maximum analyzed limit, a detectable release of radionuclides, water inventory to decrease below the analyzed limit, or an adverse effect to the SFP neutron absorber or fuel loading pattern. The team determined that the finding had a cross cutting aspect in the area of human performance because the licensee did not use a systematic process for evaluating and implementing changes when updating the affected EOP in 2015. (Section 1R21.3.b(2)) [H.3]

Inspection Report# : 2016009 (*pdf*)

Significance: N/A Dec 01, 2016

Identified By: NRC

Item Type: NCV Non-Cited Violation

Failure to Amend the UFSAR Indicating Choice to Comply with 10 CFR 50.68(b) (Section 1R21.3.b(3))

The team identified a Severity Level-IV NCV of 10 CFR 50.68, "Criticality Accident Requirements," Paragraph (b)(8), for the licensee failure to amend the Updated Final Safety Analysis Report (UFSAR) to indicate they chose to comply with 10 CFR 50.68(b). Specifically, in 2005, the licensee chose to comply with 10 CFR 50.68(b) but did not amend the UFSAR following the issuance of the associated license amendment. The licensee captured this issue in their CAP as AR 02741851, reasonably confirmed compliance with 10 CFR 50.68(b) requirements (1) through (7) was maintained, and initiated plans to update the UFSAR to specifically indicate that Clinton Power Station chose to comply with 10 CFR 50.68(b).

The Significance Determination Process does not specifically consider the impact to the regulatory process in its assessment of licensee performance. Therefore, it was necessary to address this violation, which potentially impacts the NRC's ability to regulate, using traditional enforcement to adequately deter non-compliance. Specifically, failure to update the UFSAR challenges the regulatory process because it serves as a reference document used, in part, for recurring safety analyses, evaluating License Amendment Request, and in preparation for and conduct of inspection activities. The team determined the traditional enforcement violation was a Severity Level-IV violation in accordance with Section 6.1.d.3 of the Enforcement Policy because the un-updated UFSAR had not been used to evaluate a facility or procedure change that resulted in a condition evaluated as having low-to-moderate or greater safety significance by the Significance Determination Process. However, it had a material impact on safety or licensed activities. Specifically, the un-updated UFSAR could be used to perform evaluations of facility or procedure changes, which would have the potential to result in unacceptable conditions and/or regulatory decisions. Traditional enforcement violations are not assessed for cross-cutting aspects. (Section 1R21.3.b(3))

Inspection Report# : 2016009 (*pdf*)

Significance:  Dec 01, 2016

Identified By: NRC

Item Type: NCV Non-Cited Violation

Failure to Verify the Adequacy of Design Assumptions Related to Time Critical Operator Actions (Section 1R21.6.b(1))

Green. The team identified a finding of very-low safety significance (Green) and an associated NCV of 10 CFR Part 50, Appendix B, Criterion III, "Design Control," for the licensee failure to verify the adequacy of design assumptions related to time critical operator actions made in calculations associated with the control room HVAC and RHR emergency SFP cooling functions. Subsequently, it was determined that operators did not fully understand the control room HVAC system operational demands and that the operational assumptions of the RHR emergency SFP cooling design were unrealistic. The licensee captured these issues into the CAP as AR 02739012, AR 03943566, and AR 02741909; reasonably demonstrated that SFP makeup sources would be available to cope with a prolonged loss of SFP cooling; conducted operator training; and provided refined procedural guidance to ensure the control room HVAC system would be operated consistent with the design assumptions.

The performance deficiency was determined to be more-than-minor because it was associated with the Barrier Integrity cornerstone attribute of human performance 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 pilot validations of the control room HVAC system operational assumptions demonstrated a significant reduction in margin due to, in part, a lack of operator understanding of the operational assumptions. Additionally, a preliminary review of procedures associated with SFP cooling and RHR determined the operational assumptions of the calculation related to RHR emergency SFP cooling were not bounding. The team determined that this finding was of very low safety significance (Green). Specifically, the control room HVAC system finding example only represented a degradation of the radiological barrier function provided for the control room in that it did not affect

the control room barrier function against smoke or a toxic atmosphere. In addition, the finding example related to emergency SFP cooling did not cause SFP temperature to exceed the maximum analyzed limit, a detectable release of radionuclides, water inventory to decrease below the analyzed limit, or an adverse effect to the SFP neutron absorber or fuel loading pattern. The team determined that the finding had a cross-cutting aspect in the area of Human Performance because the operation and engineering organizations did not effectively communicate and coordinate their respective roles in developing the control room HVAC system validation in a manner that supported nuclear safety. (Section 1R21.6.b(1)) [H.4]

Inspection Report# : 2016009 (*pdf*)

Significance:  Dec 01, 2016

Identified By: NRC

Item Type: NCV Non-Cited Violation

Failure to Follow the Operability Determination Process Following the Identification of a Control Room HVAC System Design Issue (Section 4OA2.b(2))

Green: The team identified a finding of very-low safety significance (Green), and an associated NCV of 10 CFR Part 50, Appendix B, Criterion V, "Instruction, Procedures, and Drawings," for the licensee failure to follow the operability evaluation procedure after the identification of a significant design error associated with the control room HVAC system. Specifically, the licensee did not identify the affected safety function, and promptly restore or confirm system operability. The licensee captured these issues into the CAP as AR 03948266 and performed a preliminary engineering evaluation using another alternative analytical methodology that reasonably determined the control room HVAC system remained operable.

The performance deficiency was determined to be more-than-minor because it was associated with the Barrier Integrity cornerstone attribute of human performance 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 performance deficiency resulted in a condition where reasonable doubt on the operability of the control room HVAC system remained following the identification of a significant design error. The finding screened as of very low safety significance (Green) because it only represented a degradation of the radiological barrier function provided for the control room. Specifically, the finding did not affect the control room barrier function against smoke or a toxic atmosphere. The team identified that the finding had a cross-cutting aspect in the area of Human Performance because the licensee did not provide training to maintain a knowledgeable workforce that would facilitate an adequate implementation of the operability evaluation process following the identification of a non-conforming design-related issue. (Section 4OA2.b(2)) [H.9]

Inspection Report# : 2016009 (*pdf*)

Significance:  Sep 30, 2016

Identified By: NRC

Item Type: NCV Non-Cited Violation

Failure to Scope Fuel Building Ventilation Pressure Control into Maintenance Rule

The inspectors identified a finding of very low safety significance and an NCV of 10 CFR 50.65 (b) for the licensee's failure to scope a non-safety related structure, system and component (SSC), whose function is used in one or more Emergency Operating Procedures (EOP) and whose failure could cause actuation of a safety-related system, into maintenance rule. Specifically, the licensee failed to scope the non-safety related fuel building pressure control function into their maintenance rule program. The licensee has entered this issue into their corrective action program as AR 02716300. The licensee is scoping the pressure control function of fuel building ventilation into maintenance rule.

The inspectors determined that the licensee's failure to scope a non-safety related system whose function is used in one

or more EOPs and whose failure caused the actuation of a safety-related system into maintenance rule was a performance deficiency. The performance deficiency was determined to be more than minor because it affects the SSC and barrier performance attribute of the Barrier Integrity cornerstone and adversely affects the cornerstone objective to provide reasonable assurance that physical design barriers (fuel cladding, reactor coolant system, and containment) protect the public from radionuclide releases caused by accidents or events. The finding was determined to be of very low safety significance because the inspectors answered yes to the question "does the finding only represent a degradation of the radiological barrier function provided for the control room, or auxiliary building, or spent fuel pool, SBT system (BWR)?" The inspectors determined this finding affected the cross-cutting area of human performance, in the aspect of avoiding complacency, because the licensee identified water intrusion of the fuel building pressure sensing line was a longstanding, latent, known problem and failed to recognize and appropriately challenge how the function was scoped into maintenance rule. (H.12)

Inspection Report# : 2016003 (*pdf*)

Significance:  Sep 30, 2016

Identified By: NRC

Item Type: NCV Non-Cited Violation

Spent Fuel Pool Liner Design not Verified per Code

The inspectors identified a finding of very low safety significance and a NCV of 10 CFR Part 50, Appendix B, Criterion III for the failure of the licensee's design control measures to provide for the verifying or checking of the adequacy of design of the spent fuel pool liner. Specifically, calculations involving the liner had not been verified or checked to ensure the design basis requirements of ASME Boiler and Pressure Vessel Code, Section III, Division II, were included. The licensee initiated AR 02690744 and initiated actions to restore compliance.

This performance deficiency was more than minor because if left uncorrected it could lead to a more significant safety concern if independent spent fuel storage installation loading was conducted. The inspectors determined the finding was of very low safety significance because each of the Barrier Integrity screening questions was answered no. The inspectors determined this issue was cross cutting in the Human Performance, Design Margin area because the licensee failed to carefully guard their design margins and ensure the margins were only changed through a systematic and rigorous process.

Inspection Report# : 2016003 (*pdf*)

Emergency Preparedness

Occupational Radiation Safety

Public Radiation Safety

Security

The security cornerstone is an important component of the ROP, which includes various security inspection activities the NRC uses to verify licensee compliance with Commission regulations and thus ensure public health and safety. The Commission determined in the staff requirements memorandum (SRM) for SECY-04-0191, "Withholding Sensitive Unclassified Information Concerning Nuclear Power Reactors from Public Disclosure," dated November 9, 2004, that specific information related to findings and performance indicators associated with the security cornerstone will not be publicly available to ensure that security-related information is not provided to a possible adversary. Security inspection report cover letters will be available on the NRC Web site; however, security-related information on the details of inspection finding(s) will not be displayed.

Miscellaneous

Significance: N/A Dec 31, 2016

Identified By: Self-Revealing

Item Type: NCV Non-Cited Violation

Dry Cask Storage Procedures were not Adequate to Ensure Correct Field Configuration

A self-revealed violation of very low safety significance (Severity Level IV) of 10 CFR 72.150, "Instructions, Procedures, and Drawings," was identified for the failure of the licensee to ensure that ISFSI procedures contained the appropriate level of detail for the circumstances such that important loading activities would be satisfactorily accomplished. Specifically, procedure HPP-2226-200, Revision 0, "MPC Loading at Clinton," was not adequate to ensure that the Multi-Purpose Canister (MPC) was correctly oriented in the transfer cask (HI-TRAC) and procedure HPP-2226-300, Revision 4, "MPC Sealing at Clinton," was not adequate to ensure that two thermocouples were appropriately installed during the hydrostatic test of the MPC.

The licensee documented these issues in its corrective action program and took timely corrective actions.

The violation was determined to be of more than minor significance using Inspection Manual Chapter (IMC) 0612, "Power Reactor Inspection Reports," Appendix E, "Examples of Minor Issues." Example 4e is applicable to this violation in that the MPC was incorrectly oriented in the transfer cask and then loaded with spent fuel in this incorrect configuration. Example 4b is also applicable to this violation in that unexpected leakage occurred during the hydrostatic test as a result of the failure to install the thermocouples. The violation screened as having very low safety significance. Cross cutting aspects are not assigned to traditional enforcement violations.

Inspection Report# : 2016004 (*pdf*)

Current data as of : August 03, 2017

Page Last Reviewed/Updated Wednesday, August 10, 2016