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Millstone 2 – Quarterly Plant Inspection Findings

3Q/2017 – Plant Inspection Findings

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Initiating Events

Mitigating Systems

Significance: G Aug 18, 2017

Identified By: NRC

Item Type: NCV Non-Cited Violation

Failure to Replace Auxiliary Feedwater Solenoid Valves within the Required Frequency

The inspection team identified a Green non-cited violation of Technical Specification 6.8.1.a, "Procedures," because Dominion did not implement procedures as required by Regulatory Guide 1.33, Revision 2, Appendix A.9, "Procedures for Performing Maintenance," to properly maintain the environmental qualification of safety-related auxiliary feedwater solenoid valves 2-FW-43AS and 2-FW-43BS. Specifically, Dominion failed to implement the recurring work event task and associated work order to ensure that these auxiliary feedwater solenoid valves were replaced prior to exceeding the qualified life of the solenoid coil and elastomer components. Dominion entered this issue into their corrective action program as condition report 1076005, planned replacement of the solenoid valves, and calculated an alternate ambient temperature for use in determining the qualified life of the solenoid valves. Dominion re-performed the qualified life calculation using this revised ambient temperature and extended the qualified life to support operability.

The inspection team determined that this issue was more than minor because it adversely impacted the equipment performance 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. This issue is also similar to more-than-minor examples 3.j and 3.k presented in IMC 0612, Appendix E, "Examples of Minor Issues." Specifically, this performance deficiency resulted in a condition where there was reasonable doubt as to the operability and reliability of the solenoid valves for both auxiliary feedwater regulating valves, and thus, both trains of auxiliary feedwater. As such, Dominion needed to conduct additional engineering evaluation to extend the service life of the solenoid valves, thus justifying that the valves would continue to perform their safety function. The inspection team determined the finding to be of very low safety significance (Green) because the finding was a deficiency affecting the

reliability of a mitigating structure, system, or component, and the structure, system, or component maintained its operability or functionality. The inspection team determined that no cross-cutting aspect was applicable because the finding was not indicative of current performance.

Inspection Report# : 2017007 (*pdf*)

Significance:  May 11, 2017

Identified By: NRC

Item Type: NCV Non-Cited Violation

Failure to Maintain CST Temperature in Accordance with Procedure Requirements

Inspection Report# : 2017001 (*pdf*)

Significance:  Dec 31, 2016

Identified By: NRC

Item Type: NCV Non-Cited Violation

Routine Failure to Perform Engineering Evaluation of Long Term Scaffolding

The inspectors identified a Green NCV of Title 10 of the Code of Federal Regulations (10 CFR) Part 50, Appendix B, Criterion V, "Instructions, Procedures, and Drawings," for the failure to adequately implement procedure MA-AA-105, "Scaffolding," Revision 17. Specifically, Dominion routinely failed to perform engineering evaluations of long term scaffolding installed in the plant for greater than 90 days. Dominion has documented this condition within their corrective action program (CAP) as condition report CR1049493.

The inspectors determined that this finding was more than minor as it represents the routine failure to perform 10 CFR 50.59 engineering evaluations consistent with the requirements of procedures MA-AA-105 and CM-AA-400 which if left uncorrected, would have the potential to lead to a more significant safety concern as informed by IMC 0612, Appendix E, "Examples of Minor Issues," example 4.a. The finding screened to be of very low safety significance (Green), when all screening questions were answered "No" as the conditions identified did not challenge safety system functions. This finding has a cross-cutting aspect in the Problem Identification and Resolution, cross-cutting area associated with Resolution, in that under CR1049057, Dominion did not take effective corrective action to resolve and correct the identified gaps in the tracking and assessment of scaffolding installed for greater than 90 days as directed by MA-AA-105 and CM-AA-400, resulting in three further failures to evaluate long term scaffolding identified by the inspectors in the Unit 2 'A' Safeguards Room.

Inspection Report# : 2016004 (*pdf*)

Significance:  Dec 31, 2016

Identified By: NRC

Item Type: NCV Non-Cited Violation

Failure to Maintain Licensed Operator Examination Integrity

The inspectors identified an NCV of 10 CFR 55.49, "Integrity of Examinations and Tests," for the failure of the licensee to ensure that the integrity of an operating test administered to licensed operators was maintained. During the annual operating exam, 19 of the Unit 2 licensed operators received more than two of five job performance measures (JPMs) (>50 percent) for their operating tests that had been administered to other licensed operators in previous weeks of the same exam cycle. This failure resulted in a compromise of examination integrity because it exceeded the Dominion Nuclear Fleet Procedure TR-AA-730, "Licensed Operator Biennial and Annual Operating Requalification Exam Process," Revision 9, requirement to repeat less than or equal to 50 percent of the JPMs during the exam cycle. However, this compromise did not lead to an actual effect on the equitable and consistent administration of the examination. This issue was entered into Dominion's CAP as CR1056308.

The failure of Dominion's training staff to maintain the integrity of examinations administered to licensed operations personnel was a performance deficiency. The performance deficiency was more than minor, and therefore a finding, because if left uncorrected, the performance deficiency could have become more significant in that allowing licensed operators to return to the control room without valid demonstration of appropriate knowledge on the biennial examinations could be a precursor to a more significant event. Using IMC 0609, "Significance Determination Process," and the corresponding Appendix I, "Licensed Operator Requalification Significance Determination Process," the finding was determined to have very low safety significance (Green) because although the finding resulted in a compromise of the integrity of operating test JPMs and compensatory actions were not immediately taken when the compromise should have been discovered in 2016, the equitable and consistent administration of the test was not actually impacted by this compromise. This finding has a cross-cutting aspect in the area of Human Performance associated with Field Presence, because the licensee failed to ensure that deviations from standards and expectations are corrected promptly such that the 50 percent maximum limit on repeated JPMs was not exceeded. Specifically, Dominion supervisory review and approval of the original examination plan and subsequent changes to that plan could have discovered the deviation from standards and expectations.

Inspection Report# : 2016004 (*pdf*)

Barrier Integrity
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

Current data as of : November 29, 2017

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