



Home > Nuclear Reactors > Operating Reactors > Reactor Oversight Process > Plant Summaries > Palisades > Quarterly Plant Inspection Findings

## Palisades – Quarterly Plant Inspection Findings

### 3Q/2017 – Plant Inspection Findings

On this page:

- Initiating Events
- Mitigating Systems
- Barrier Integrity
- Emergency Preparedness
- Occupational Radiation Safety
- Public Radiation Safety
- Security

#### Initiating Events

#### Mitigating Systems

**Significance:** G Dec 31, 2016

Identified By: NRC

Item Type: NCV Non-Cited Violation

#### **Failure to Have Appropriate Controls in Place for Combustible Materials**

A finding of very low safety significance and an associated NCV of Title 10 of the Code of Federal Regulations (10 CFR), Part 50, Section 48(c) was identified by the inspectors for the licensee's failure to appropriately implement the requirements of procedure EN-DC-161, "Control of Combustibles." Specifically, between January 1, 2016 and October 22, 2016, the inspectors identified several examples of the licensee's failure to have appropriate controls in place for the storage of combustible materials in excess of the limits required for those respective areas without a completed transient combustible evaluation (TCE). Also, on several occasions from October 19, 2016 to October 22, 2016, the required compensatory actions for a TCE related to the dry fuel storage cask transporter vehicle were not appropriately implemented as required by procedure EN-DC-161. The licensee entered these issues in their corrective action program (CAP) as condition reports (CRs) CR-PLP-2016-03633, CR-PLP-2016-05148, and CR-PLP-2016-0564. Corrective actions for these issues included completing the required TCEs, ensuring the combustible materials in the areas were addressed by the combustible loading calculations, and ensuring appropriate compensatory measures were implemented.

The issue was determined to be more than minor in accordance with IMC 0612, Appendix B, "Issue Screening," because it was associated with the Protection Against External Factors attribute, in the area of Fire, 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 (i.e., core damage). Specifically, transient combustible materials without required TCEs were stored in the charging pump cubicles and in the refueling and spent fuel pool areas. The finding screened as having very low safety significance (Green) in accordance with IMC 0609, Appendix F, "Fire Protection Significance Determination Process," since none of the

stored materials were self igniting, low flashpoint liquids, or heat sources and was therefore assigned a "Low" degradation rating. The finding had a cross cutting aspect of Training in the Human Performance cross cutting area due to the common element of a lack of knowledge of the individuals with the control of combustibles process and understanding their roles in that process

Inspection Report# : 2016004 (*pdf*)

**Significance:**  Dec 31, 2016

Identified By: Self-Revealing

Item Type: NCV Non-Cited Violation

#### **Failure to Correct an Adverse Condition Associated with Diesel Generator Load Sequencer Module**

A finding of very low safety significance and an associated NCV of 10 CFR, Part 50, Appendix B, Criterion XVI, "Corrective Action," was self revealed for the licensee's failure to promptly correct a condition adverse to quality. Specifically, the licensee failed to correct an adverse condition associated with the emergency diesel generator (DG) load sequencer and power supply module as revealed when the electrolytic capacitor failed two days after installation. The 1-2 DG was declared inoperable, the licensee replaced the failed module, and an equipment apparent cause evaluation was completed for the equipment failure. An internal operating experience review revealed that a similar issue occurred in 2005 and corrective actions to address that failure, which included establishing shelf life and age requirements for electrolytic capacitors that were part of power supply modules, were not applied to this module. The licensee entered this issue into their Corrective Action Program CAP as CR-PLP-2016-03260.

The issue was determined to be more than minor in accordance with Inspection Manual Chapter (IMC) 0612, Appendix B, because the performance deficiency 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 (i.e., core damage). Specifically, the licensee failed to correct a condition adverse to quality, which rendered the 1-2 DG inoperable. This condition would have prevented the DG from automatically starting and loading on the prescribed signal. The finding was screened in accordance with IMC 0609, Appendix A, and was determined to have very low safety significance (Green) based on answering "No" to all the screening questions under the Mitigating Structure, System and Components, and Functionality section. The inspectors concluded that the corrective actions for the adverse condition of the aging electrolytic capacitors should have been implemented greater than three years ago, so the finding was not reflective of current licensee performance. Therefore, no cross cutting aspect was identified.

Inspection Report# : 2016004 (*pdf*)

#### **Barrier Integrity**

**Significance:**  Dec 31, 2016

Identified By: NRC

Item Type: NCV Non-Cited Violation

#### **Failure to Translate Design Analysis Stack-up Configuration into Specifications, Drawings, Procedures, and Instructions**

A finding of very low safety significance and an associated Non-Cited Violation (NCV) of 10 CFR, Part 50, Appendix B, Criterion III, "Design Control," was identified by the inspectors for the licensee's failure to establish measures to assure that the applicable regulatory requirements and the design basis were correctly translated into specifications, drawings, procedures, and instructions. Specifically, the licensee failed to provide instructions in procedures to construct the spent fuel dry cask loading stack up, in the safety-related auxiliary building, in the configuration that had been analyzed for in the stack up seismic design basis calculation. In addition, the licensee failed to provide instructions

in revised procedures to construct the stack up without certain gaps as specified in the stack up seismic design basis document. The licensee documented these issues in their Corrective Action Program (CAP) as Condition Report (CR) -PLP-2016-00646, CR-PLP-2016-01308, CR-PLP-2016-01558, CR-PLP-2016-04497, and CR-PLP-2016-04826; revised the stack up seismic analysis to address the identified issues; and translated the analyzed stack up design configuration into stack up installation procedures prior to performing stack up operations with spent nuclear fuel in the multi purpose canister.

The issue was determined to be more than minor in accordance with Inspection Manual Chapter (IMC) 0612, Appendix B, "Issue Screening," because it was associated with the Design Control attribute of the Barrier Integrity cornerstone 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 stack up configuration that did not ensure stack up dynamic stability or Auxiliary Building structural integrity to maintain radiological barrier functionality during a design basis seismic event. The finding screened as having very low safety significance (Green) because it did not result in the loss of operability or functionality of the Auxiliary Building. The finding had a cross cutting aspect of Field Presence in the Human Performance cross cutting area, because licensee senior managers failed to ensure effective supervisory and management oversight of contractor activities related to the seismic analysis and installation of the stack up configuration

Inspection Report# : 2016004 (*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**

Current data as of : November 29, 2017

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