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Palo Verde 2 – Quarterly Plant Inspection Findings

3Q/2017 – Plant Inspection Findings

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Initiating Events

Mitigating Systems

Significance: G Mar 31, 2017

Identified By: NRC

Item Type: NCV Non-Cited Violation

Failure to establish station procedure instructions for denial work authorizations

The inspectors identified a Green, non-cited violation of Technical Specification 5.4.1.a, "Procedures," for the failure to establish procedure instructions for work authorization denials or deferrals. Specifically, this led to a 60 day extended unavailability of the diverse auxiliary feedwater actuation system when corrective maintenance was inappropriately deferred by the operations department.

Failure to provide adequate procedural guidance in the event of a denied work authorization, a circumstance anticipated to occur, is a performance deficiency. The performance deficiency is more than minor, because it affected the equipment performance attribute of the Mitigating Systems Cornerstone objective to ensure the availability and reliability of equipment that responds to an initiating event. Specifically, because the corrective maintenance was not performed in a timely manner, both trains of the diverse auxiliary feedwater actuation system remained in bypass for an additional 60 days whereby the system was not capable of performing its required safety function. The inspectors evaluated the significance of the finding using Inspection Manual Chapter 0609, Appendix A, "Significance Determination Process for Findings at Power," Exhibit 2, "Mitigating Systems Screening Questions," Section A, Question 2, which required a detailed risk evaluation because the finding involved a loss of system safety function. A Region IV senior reactor analyst performed a detailed risk assessment of the finding and determined that the finding was of very low safety significance (Green). The inspectors determined that the finding had a cross-cutting aspect in the human performance area of Work Management. The work process includes the identification and management of risk commensurate to the work and the need for coordination with different groups or job activities. Specifically, the Unit Operations Manager's decision to deny the work authorization was based on conservative but faulty assumptions, and if other work groups with greater specific technical knowledge had been involved, the corrective maintenance

likely would have proceeded [H.5].

Inspection Report# : 2017001 (*pdf*)

Significance: G Dec 29, 2016

Identified By: NRC

Item Type: NCV Non-Cited Violation

Inadequate monitoring of MSIV nitrogen pre-charge pressure

Green. The inspectors reviewed a self-revealing non-cited violation of Technical Specification 3.7.2 for exceeding the Condition A completion time for an inoperable main steam isolation valve (MSIV) single actuator train and not immediately declaring the affected main steam isolation valve inoperable in accordance with Condition E. Specifically, the Unit 2 main steam isolation valve 171 actuator A was inoperable from July 30, 2016, to August 9, 2016, when a known nitrogen leak was not adequately monitored. The licensee's inadequate monitoring allowed the nitrogen pre-charge pressure in the actuator to decrease to below the minimum acceptable limit for operability. The licensee restored the pre-charge pressure and entered this issue into their corrective action program as Condition Report 16-12740.

The failure to perform adequate monitoring for a degraded condition as required by procedure 40DP-9OP26, "Operations Condition Reporting Process and Operability Determination/Functional Assessment," was a performance deficiency. The performance deficiency was more-than-minor and therefore a finding because it affected the equipment performance attribute of the Mitigating Systems Cornerstone to ensure the availability, reliability, and capability of systems that respond to initiating events to prevent undesirable consequences. Specifically the failure to adequately monitor a known nitrogen leak resulted in depressurizing one of two hydraulic accumulators thereby reducing the reliability of the system to initiate a fast closure of MSIV 171 upon receipt of a main steam isolation signal. The inspectors performed the initial significance determination using NRC Inspection Manual Chapter 0609, Appendix A, Exhibit 2, "Mitigating Systems Screening Questions," Issue Date: June 9, 2012. The finding required a detailed risk evaluation since it represented a loss of function for a single train for greater than the Technical Specification allowed outage time. A Region IV senior reactor analyst determined the finding was of very low safety significance (Green) since the MSIV remained capable of performing its safety function with the alternate actuator. The finding has a cross-cutting aspect in the area of human performance associated with the teamwork component. Specifically, the licensee failed to coordinate activities across organizational boundaries in that the operations personnel did not obtain engineering input to ensure that additional monitoring requirements for the nitrogen pre-charge leak were adequate to verify continued MSIV 171 operability.

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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