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North Anna 1 – Quarterly Plant Inspection Findings

4Q/2017 – Plant Inspection Findings

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Initiating Events

Mitigating Systems

Significance: G Jun 02, 2017

Identified By: NRC

Item Type: NCV Non-Cited Violation

Failure to Qualify MCCs in Cable Penetration areas in accordance with 10 CFR 50.49

The NRC identified a Green non-cited violation of 10 CFR 50.49(f) for failing to qualify structures, systems, and components (SSCs) (eight motor control centers) located in a radiation harsh environment in accordance with IEEE Std. 323-1974 Section 5, "Principles of Qualification." In response to this issue, the licensee performed an operability determination and determined that the motor control centers (MCCs) were operable based on the material similarity of the original SSCs and the new SSCs. This issue has been entered into the corrective action program as CR 1065894.

The performance deficiency was determined to be 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 the safety related AC Power System. Specifically, the failure to perform environmental qualification for SSCs subject to a harsh environment, during which they must perform a safety function adversely affected the reliability of that equipment when called upon. This finding was not assigned a cross-cutting aspect because the issue did not reflect current licensee performance.

Inspection Report# : 2017007 (*pdf*)

Significance: G Jun 02, 2017

Identified By: NRC

Item Type: NCV Non-Cited Violation

Failure to Qualify EGS Quick Disconnects in Accordance With IEEE Std. 323-1974

The NRC identified a Green non-cited violation of 10 CFR 50.49(e)(5) for failing to base the qualified life of structures, systems, and components (SSCs) (i.e. Nordel Orings) on the known limits of extrapolation in accordance with IEEE 323 Sections 6.5.3, "Extrapolation," and 6.5.4 "Determination of Qualification." In response, the licensee determined that the affected components remained operable because the age of the O-rings in question was within the original qualification. The licensee entered this into their corrective action program as CR 1065957.

The performance deficiency was determined to be more than minor because if left uncorrected, the performance deficiency would have the potential to lead to a more significant safety concern. Specifically, the failure to properly determine the qualified life and replace the O-rings at the required time interval would adversely affect the reliability of that equipment when called upon to respond to initiating events and prevent undesirable consequences. This finding was not assigned a cross-cutting aspect because the issue did not reflect current licensee performance.

Inspection Report# : 2017007 (*pdf*)

Significance: **NOPD** Jun 02, 2017

Identified By: NRC

Item Type: NCV Non-Cited Violation

Failure to Obtain NRC Approval for Changes to Safety-Related Dike West of Unit 2 Turbine Building for Flood Mitigation Strategy

The team identified a Severity Level IV non-cited violation of 10 CFR 50.59(c)(2), "Changes, Tests, and Experiments," for the licensee's failure to obtain a license amendment, as specified by Nuclear Energy Institute (NEI) 96-07 Section, 4.3.2, prior to implementing a change that increased the likelihood of a malfunction of a safety-related dike. This has been entered into the licensee corrective action program as condition

report 1065945.

The violation was dispositioned using the traditional enforcement process in accordance with the NRC Enforcement Policy, Subsection 2.2.2 Revised August 1, 2016, because the issue affected the NRC's ability to perform its regulatory oversight function. The NRC Enforcement Policy, Section 6.1, "Violation Examples for Reactor Operations," Subsection 6.1.d.2 specified that violations of 10 CFR 50.59 which resulted in conditions that were evaluated by the Significance Determination Process (SDP) as being of very low safety significance represented a severity level IV violation. The regional senior

reactor analyst performed a screening analysis to determine the significance of the violation. Using very conservative failure frequencies for ductile iron pipe used in water systems, and a conservative initiating event frequency for an

independent simultaneous rainfall capable of filling the dike, the finding was determined to be of very low safety significance. The inspector determined that the detailed risk evaluation confirmed that a severity level IV violation was appropriate. Crosscutting aspects are not assigned to traditional enforcement violations.

Inspection Report# : 2017007 (*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 : February 01, 2018

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