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Palo Verde 2 – Quarterly Plant Inspection Findings

4Q/2017 – Plant Inspection Findings

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Initiating Events

Mitigating Systems

Significance: G May 10, 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 Apr 06, 2017

Identified By: NRC

Item Type: NCV Non-Cited Violation

Failure to Analyze Shutdown Cooling and Feedwater Lines for High-Energy Line Break Pipe Whip Effects

The team identified a Green non-cited violation of 10 CFR Part 50, Appendix B, Criterion III, "Design Control," which states, in part, "Measures shall be established to assure that applicable regulatory requirements and the design basis, as defined in § 50.2 and as specified in the license application, for those structures, systems, and components to which this appendix applies are correctly translated into specifications, drawings, procedures, and instructions." Specifically, from August 11, 1982, to March 3, 2017, the licensee did not analyze dynamic pipe whip effects of a main feedwater line for a high-energy line break of a shutdown cooling line. In response to this issue, the licensee performed immediate and prompt operability evaluations and determined that the piping systems remained operable and could withstand the effects of a high-energy line break. This finding was entered into the licensee's corrective action program as Condition Report CR-17-02815.

The team determined that the failure to perform an adequate analysis for shutdown cooling and feedwater lines for high-energy line break pipe whip effects was a performance deficiency. This finding was more-than-minor because it was associated with the design control 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, the failure to analyze the main feedwater piping for high-energy line break effects called the operability of the piping system into question. In accordance with Inspection Manual Chapter 0609, Appendix A, "The Significance Determination Process (SDP) for Findings At-Power," dated June 19, 2012, Exhibit 2, "Mitigating Systems Screening Questions," the issue screened as having very low safety significance (Green) because it was a design or qualification deficiency that did not represent a loss of operability or functionality; did not represent an actual loss of safety function of the system or train; did not result in the loss of one or more trains of non-technical specification equipment; and did not screen as potentially risk significant due to seismic, flooding, or severe weather. The team determined that this finding did not have a cross-cutting aspect because the most significant contributor to the performance deficiency did not reflect current licensee performance. Specifically, the licensee performed the calculation in 1982 and revised it in 1991; therefore, the performance deficiency occurred outside of the nominal three-year period for "present performance."

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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