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Robinson 2 – Quarterly Plant Inspection Findings

4Q/2017 – Plant Inspection Findings

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Initiating Events

Mitigating Systems

Significance: G Dec 04, 2017

Identified By: NRC

Item Type: NCV Non-Cited Violation

Failure to Correctly Determine Qualified Life

The NRC identified a non-cited violation of Title 10 of the Code of Federal Regulations (10 CFR) Part 50, Appendix B, Criterion V, "Instructions, Procedures, and Drawings," for the

licensee's failure to establish a qualified life for the motors covered by Environmental Qualification Documentation Package (EQDP)-0803 in accordance with their administrative

procedure AD-EG-ALL-1612, "Environmental Qualification (EQ) Program." Specifically, the licensee did not correctly establish a qualified life for the motors covered by EQDP-0803 due to

a calculational error. In response to the issue, Robinson staff placed the issue in their corrective action program as NCRs 2155050 and 2158467, and demonstrated operability by removing

conservatism regarding assumptions for cumulative energized time of the motors. Additionally, the licensee plans to replace the affected motors.

This performance deficiency was 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 availability, reliability, and capability of systems that respond to initiating events to prevent undesirable consequences. Specifically, not establishing

the correct qualified life for the motors resulted in a reduction in margin that impacted the reliability of the equipment. The team determined the finding to be of very low safety

significance (Green) because the finding was a deficiency affecting the design or qualification of a mitigating structure, system, or component (SSC), and the SSC maintained its operability or

functionality. The inspectors determined that the finding was indicative of current licensee performance, because the error occurred on June 28, 2017. A cross-cutting aspect of

Documentation [H.7] in the Human Performance Area was assigned because the organization did not create and maintain complete, accurate and up to-date documentation.

Inspection Report# : 2017007 (*pdf*)

Significance:  Dec 04, 2017

Identified By: NRC

Item Type: NCV Non-Cited Violation

Failure to Perform Required O-ring Replacement to Maintain Qualification

The NRC identified a non-cited violation of 10 CFR Part 50.49, "Environmental qualification of electric equipment important to safety for nuclear power plants," for the

licensee's failure to correctly identify the maintenance required to maintain the core exit thermocouple reference junction box in a qualified state. Specifically, the licensee did not

identify that the qualifying entity required that the cover O-ring be replaced on a 5 year frequency in addition to being replaced any time the junction box cover was removed, and due

to this, the O-rings have not been replaced since original installation. In response to the issue, Robinson staff placed the issue in their corrective action program as NCRs 2157897 and

2161580, and demonstrated operability via analysis of the qualification test results.

This performance deficiency was 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 availability, reliability, and capability of systems that respond to initiating events to prevent undesirable consequences. Specifically, not maintaining

the equipment in its qualified configuration affected its reliability. The inspectors determined the finding to be of very low safety significance (Green) because the finding was a deficiency

affecting the design or qualification of a mitigating structure, system, or component (SSC), and the SSC maintained its operability or functionality. A cross-cutting aspect was not assigned

because the finding was not indicative of current licensee performance.

Inspection Report# : 2017007 (*pdf*)

Significance:  Dec 04, 2017

Identified By: NRC

Item Type: NCV Non-Cited Violation

Failure to Determine Most Severe Containment Spray pH

The NRC identified a non-cited violation of 10 CFR Part 50.49, "Environmental qualification of electric equipment important to safety for nuclear power plants," for the

licensee's failure to correctly determine the most severe composition of chemicals for containment spray for the purposes of environmental qualification of equipment in containment.

Specifically, the licensee did not identify that the pH of the chemical spray could have been more severe than what was identified in the Environmental Qualification zone maps if the Spray

Additive Tank (SAT) had been operated at its limits provided in procedures CP-001 and OST-023. In response to this issue, the licensee placed the issue into their corrective action program

as NCR 2162081, demonstrated operability by reviewing current and historical operating conditions of the tank, and implemented administrative controls to prevent exceeding the

qualified pH limit.

This performance deficiency was more than minor because if left uncorrected, the performance deficiency had the potential to lead to a more significant safety concern. Specifically, the

containment spray pH could have exceeded the pH to which equipment inside containment was qualified, if the SAT had been operated at its procedural limits. The inspectors determined the

finding to be of very low safety significance (Green) because the finding was a deficiency affecting the design or qualification of a mitigating structure, system, or component (SSC), and

the SSC maintained its operability or functionality. A cross-cutting aspect was not assigned because the finding was not indicative of current licensee performance.

Inspection Report# : 2017007 (*pdf*)

Barrier Integrity

Significance: G May 05, 2017

Identified By: NRC

Item Type: NCV Non-Cited Violation

Failure to Perform General Visual Examinations of Containment Moisture Barriers Associated with Containment Liner Leak-Chase Test Connections

An NRC-identified Green non-cited violation (NCV) of 10 CFR Part 50.55a, "Codes and Standards," was identified for the failure to perform general visual examinations of moisture barriers in the containment leak-chase channel test connections in accordance with the American Society of Mechanical Engineers Boiler and Pressure Vessel Code (ASME BPVC), Section XI, Subsection IWE. Following the inspectors' identification of this issue, the licensee initiated actions to conduct the required visual examinations during the March 2017 refueling outage and initiated actions to revise the containment inservice inspection (ISI) plan such that the required examinations will be performed in the future. This issue was entered into the licensee's corrective action program (CAP) as nuclear condition report (NCR) 02109909.

The failure to conduct the required visual examination of moisture barrier material in accordance with the ASME BPVC, Section XI, Subsection IWE, was a performance deficiency (PD). The finding was of more than minor significance because, if left uncorrected, it had the potential to lead to a more significant safety concern. Specifically, visual examinations of moisture barriers associated with the containment leak-chase channel test connections provide assurance that the containment metal liner and liner seam welds remain capable of performing its intended safety function. In the absence of such examinations, corrosive conditions at the moisture barrier (concrete-to-tubing interface) could go undetected. As a result, degradation of inaccessible portions of the containment liner could progress to challenge the containment operational capability. Using IMC 0609, Attachment 4, "Initial Characterization of Findings," the finding was determined to affect the Barrier Integrity Cornerstone because it involved ISI program examinations designed to identify degradation of the containment metal liner. The inspectors screened the finding using IMC 0609, Appendix A, "The Significance Determination Process (SDP) For Findings At-Power," "Exhibit 3 - Barrier Integrity Screening Questions," and determined that the finding was of very low safety significance (Green) because it did not represent an actual open pathway in the physical integrity of the containment. The inspectors reviewed this performance deficiency for cross-cutting aspects as required by IMC 0310, "Components With Cross-Cutting Aspects." The finding was determined to be reflective of present licensee performance because in 2014, the licensee did not take effective corrective actions to implement the ASME BPVC requirements in the Subsection IWE Program, when a reasonable opportunity was available through the review of NRC Information Notice (IN) 2014-07, which highlighted this industry-wide problem. Therefore, the finding was assigned a cross-cutting aspect in the resolution component of the problem identification and resolution cross-cutting area.

Inspection Report# : 2017001 (*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

Significance: N/A May 05, 2017

Identified By: NRC

Item Type: NCV Non-Cited Violation

Failure to Submit Complete and Accurate Information for a Requested License Amendment

An NRC-identified severity level IV (SL IV) NCV of 10 CFR 50.9(a), "Completeness and Accuracy of Information," was identified for the licensee's failure to

provide complete and accurate information in a license amendment request (LAR), dated November 19, 2015, requesting extension of the containment leak rate test frequencies

required by various containment technical specifications (TSs). In this LAR, the licensee incorrectly stated that they had revised their ASME BPVC, Section XI, Subsection IWE

program to include visual examinations of the test connections in the leak-chase channel penetration pressurization system (PPS), when in fact, the program had not been revised

and the examinations had not been performed. This information was material to the NRC because it was used, in part, as the basis for the approval and issuance of License

Amendment 247, dated October 11, 2016, extending the TS containment leak rate test frequencies. The licensee's corrective actions included conducting the visual examinations

of the test connections in the leak-chase channel PPS during the ongoing refueling outage in March 2017 and initiating actions to add the visual examination requirements to their

Subsection IWE program. This issue was entered into the licensee's CAP as NCR 02110516.

The failure to provide complete and accurate information in accordance with 10 CFR 50.9(a) for the LAR associated with License Amendment 247 is a violation of NRC

requirements. This violation was screened against the ROP guidance in IMC 0612, Appendix B, "Issue Screening," and no associated ROP finding was identified. The

inspectors evaluated this issue using the Traditional Enforcement process because it had the potential to impact the NRC's ability to perform its regulatory function. Specifically, the

violation impacted the regulatory process, in that the inaccurate information was material to the NRC's review and acceptance of licensee actions to address the industry-wide

operating experience discussed in NRC IN 2014-07. Based on licensee inaccurate information that they had addressed IN 2014-07 by revising their containment ISI

program to perform visual inspections of accessible tubing in the containment leak-chase channel PPS system, the NRC staff concluded that the licensee was properly

implementing the ASME BPVC, Section XI, Subsection IWE program. In accordance with the guidance in Sections 2.2 and 6.9 of the NRC Enforcement Policy, the inspectors

determined this is an SL IV violation, because had the information been complete and accurate at the time provided, it likely would have resulted in the need for further

clarification of the licensee's actions to address NRC IN 2014-07, but would not have caused the NRC to change its decision to issue the license amendment or resulted in

substantial further inquiry. Also, on March 23, 2017, the licensee completed the visual examinations of the subject tubing in the leak-chase channel system and did not identify

any significant degradation. In accordance with IMC 0612, Appendix B, traditional enforcement issues are not assigned a cross-cutting aspect.

Inspection Report# : 2017001 (*pdf*)

Current data as of : February 01, 2018

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