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Sequoyah 1 – Quarterly Plant Inspection Findings

1Q/2018 – Plant Inspection Findings

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Initiating Events

Mitigating Systems

Significance: **G** Jan 24, 2018

Identified By: NRCI

Item Type: NCV Non-Cited Violation (NCV)

Unjustified Qualified Life for Target Rock Power-Operated Relief Valves (PORVs)

The team identified a Green NCV of Title 10 Code of Federal Regulations 50.49(e)(5) “Aging” when the licensee failed to replace, refurbish, or demonstrate additional life for components that exceeded their qualified life. The licensee failed to justify changes to the accelerated aging calculations used for power operated relief valve harsh environmental qualification. The licensee entered this issue into their corrective action program as CRs 1365730 and 1366082, and performed operability determinations, which determined the systems were operable but non-conforming with 10 CFR 50.49.

The failure to justify the aging acceleration rate and basis upon which it was established in accordance with NUREG-0588 and RG 1.89 was a performance deficiency. The performance deficiency was determined to be 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 ensure that Target Rock

PORVs were qualified for the duration they were required to operate reduced the reliability of reactor coolant system in the harsh environments of DBAs. In accordance with IMC 0609.04, “Initial Characterization of Findings,” and Exhibit

2 of IMC 0609, Appendix A, "The SDP for Findings At-Power," the team determined that the finding was of very low significance (Green) because it was a design deficiency that potentially affected the design or qualification of a mitigating system, however, the mitigating system maintained its operability. The team determined there was no cross-cutting aspect associated with this finding since it was not indicative of current licensee performance.

Inspection Report# : 2017008 (*pdf*)

Significance: G Jan 24, 2018

Identified By: NRCI

Item Type: NCV Non-Cited Violation (NCV)

Inadequate Qualification for Unit One Reactor Lower

The team identified a Green NCV of Title 10 Code of Federal Regulations 50.49(f) "Electrical Equipment Qualification" when the licensee failed to perform an adequate similarity analysis for the environmental qualification of their Reliance 75 horsepower reactor lower compartment cooling fan motors. The licensee entered this issue into their corrective action program as CR1366056 and performed an operability determination, which determined the reactor lower compartment cooling fan motors were operable but non-conforming in accordance with 10 CFR 50.49.

The performance deficiency was determined to be 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, failing to ensure the qualification of the reactor lower compartment cooling fan motors adversely affected their reliability and capability in the harsh environment of a design basis accident, which in turn adversely affected the

reliability and capability of other environmentally qualified components that rely on the containment cooling system. In accordance with IMC 0609.04, "Initial Characterization of Findings," and Exhibit 2 of IMC 0609, Appendix A, "The SDP for Findings At-Power," the team determined that the finding was of very low significance (Green) because it was a design deficiency that potentially affected the design or qualification of a mitigating system; however, the mitigating system maintained its operability. The team determined there was no cross-cutting aspect associated with this finding since it was not indicative of current licensee performance.

Inspection Report# : 2017008 (*pdf*)

Significance: G May 03, 2017

Identified By: NRCI

Item Type: NCV Non-Cited Violation (NCV)

Degraded Fire Barrier Penetration

The NRC identified a non-cited violation of the facility's operating license for the failure to identify a nonfunctional fire barrier penetration and enter it into the corrective action program (CAP) when the initial damage to the fire barrier occurred. The licensee also failed to implement required compensatory measures for a nonfunctional fire barrier

penetration contrary to the approved fire protection report. The licensee entered the issues into their CAP as Condition Report (CR) 1263322.

The performance deficiency was determined to be more than minor because it was associated with the protection against external events (fire) attribute of the Mitigating Systems cornerstone and adversely affected the cornerstone objective in that there was no assurance the fire barrier would prevent the spread of fire through the cable penetration during a design basis fire. The finding was of very low safety significance (Green) due to fully functional automatic suppression systems on either side of the fire barrier. The inspectors identified a cross-cutting aspect in the Identification component of the Problem Identification and Resolution area, because the licensee failed to enter the damaged fire barrier into their CAP after it was initially damaged [P.1]

Inspection Report# : 2017001 (*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.

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