

NON-CONCURRENCE PACKAGE

RIVER BEND STATION – NRC PROBLEM IDENTIFICATION AND RESOLUTION
INSPECTION REPORT 05000458/2011006

August 31, 2011

This NCP document is a redacted version to protect personal privacy within the deliberative process.

NON-CONCURRENCE PROCESS

SECTION A - TO BE COMPLETED BY NON-CONCURRING INDIVIDUAL

TITLE OF DOCUMENT	ADAMS ACCESSION NO.
RIVER BEND STATION - NRC PI&R REPORT 05000458/2011006	N/A
DOCUMENT SPONSOR	SPONSOR PHONE NO.
Michael Hay, Chief, TSB DRS	817-276-6527
NAME OF NON-CONCURRING INDIVIDUAL	PHONE NO.
Andrew J. Barrett	225-635-3193

☐ DOCUMENT AUTHOR ☒ DOCUMENT CONTRIBUTOR ☐ DOCUMENT REVIEWER ☐ ON CONCURRENCE

TITLE	ORGANIZATION
Resident Inspector - River Bend Station	Region IV, Division of Reactor Projects, PBC

REASONS FOR NON-CONCURRENCE

During the Biennial Problem Identification and Resolution inspection at River Bend Station, we identified that the licensee had found door sealing deficiencies in the control room envelope. The deficiencies were identified in consecutive performances of the surveillance procedure "Control Room Habitability Assessment," which is performed on an 18 month frequency. The surveillance test procedure satisfies the technical specification 5.5.14 requirements to maintain the CRE boundary in its design condition including configuration control and preventive maintenance. During the performance of the surveillance in 2008, the licensee documented the following deficiencies for doors CB 116-22 and CB 116-23: "Air Leaks Adj weather strip CR-RBS-2008-05311 WR-139913 WR 139914." During the second performance of the test (note, assessment procedure performed by a different engineer) in 2010, the licensee documented the following deficiency for door CB 116-22: "Gap is even, air leaks around door, but is negligible. Wrote CR-RBS-2010-1148." The work requests and condition report documented in 2008 were closed to a work order. This work order was given a priority of 5 (the lowest priority level) and left unplanned. In 2010, CR-RBS-2010-1148 was closed to the same work order. The inspectors found that over one year later, the work order had yet to be planned, and the issue with the door seals on CB-116-22 had not been fully evaluated. To this day, the licensee has not fully evaluated or addressed the door sealing deficiency.

NEI 99-03, "Control Room Habitability Assessment," contains the NRC endorsed standards for evaluating deficiencies in control room envelopes to meet the recommendations of Regulatory Guide 1.197. The following information provided in the appendices of NEI 99-03 detail the standards for detecting deficiencies in the control room envelope:

Appendix H. System Assessment
3.4.4 (page H-7)

Doors in Control Room Boundary

Door Seals can be a potential significant source of in-leakage. Experience has indicated that the door to door frame (sides and top of door) and the floor (bottom of door) can be significant leak locations. The inspection should ensure not only the integrity of the seals, but verify that the door is properly compressing the seals.

Table H-1 Determination of Vulnerability Susceptibility

System Component	Determining Inleakage Vulnerabilities
Envelope Doors	

1). Determine that there are no defects in the doors.

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SECTION B - TO BE COMPLETED BY NON-CONCURRING INDIVIDUAL'S SUPERVISOR

(THIS SECTION SHOULD ONLY BE COMPLETED IF SUPERVISOR IS DIFFERENT THAN DOCUMENT SPONSOR.)

NAME

Vince Gaddy

TITLE

Branch Chief

PHONE NO.

817-860-8144

ORGANIZATION

Plant Branch C, Division of Reactor Projects

COMMENTS FOR THE DOCUMENT SPONSOR TO CONSIDER

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Vince G. Gaddy

DATE

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SECTION D: CONTINUATION PAGE

CONTINUATION OF SECTION



A



B



C

- 2). Determine that the door seals (including sweeps) are not cracked, are not missing and have proper fit.
- 3). Determine that doors are properly compressed or fitting against the door seals.
- 4). Determine that door latches are functioning properly to maintain the door securely closed.
- 5). Determine that door frames are properly sealed.

Appendix J. Control Room Envelope Sealing Program

3.1 Doors and Door Seals

The door should fit properly in the frame, with hinges securely attached. Door sweep should be in continuous contact with the floor or threshold for the entire width of the door. The gasket or seal should be an approved type, be free of cracks and should form a contact seal around the entire perimeter of the door. The door and frame should be free of breaks or open holes. With

Conclusion:

The nonconcurring inspector contends that an additional observation should be included in the report under Section 3, Assessment - Effectiveness of Corrective Action Program documenting the untimely actions to fully address a deficient condition that could potentially impact the integrity of the control room envelope. This is reinforced by the failure to ensure that the control room envelope was maintained to the standards as presented in NEI-99-03.

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ADAMS ACCESSION NO.

River Bend Station - NRC PI&R REPORT 05000458/2011006

SECTION C - TO BE COMPLETED BY DOCUMENT SPONSOR

NAME

Michael Hay

TITLE

Branch Chief

PHONE NO.

817-276-6527

ORGANIZATION

Project Support Branch 1, Division of Reactor Safety

ACTIONS TAKEN TO ADDRESS NON-CONCURRENCE (This section should be revised, as necessary, to reflect the final outcome of the non-concurrence process, including a complete discussion of how individual concerns were addressed.)

Multiple meetings were conducted with myself, Andy Barrett, Harold Walker, and Bob Hagar to discuss the issue. Bob Hagar was the team lead for the PIR inspection, and Harold Walker, a technical expert in NRR/Division of Safety Systems/Containment and Ventilation Branch provided technical support.

These discussions focused on assessing the adequacy of the licensee's actions following their identification of control room envelope (CRE) door seals that had leakage.

Based on our discussions I was not able to conclude that the licensee was inappropriately handling the issue or that a current safety concern existed. The licensee had evaluated the door seal leakage as "negligible," thereby implying that this condition was not a condition adverse to quality requiring prompt corrective actions. CRE leakage surveillance test results in 2008 and 2010 indicated that the overall leakage of the CRE was less than 4 percent of the allowable leakage. In addition, the surveillance results in 2010 showed no decrease in safety margin, in fact the test results showed slightly better results.

I agree the licensee could have handled the issue better. Their evaluation of door leakage could have been more thorough, the work requests could of been prioritized higher and performed sooner, or they could of concluded based on the negligible leakage no actions were currently needed.

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