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ND-22-0924

10 CFR 50.73(a)(2)(i)(B)
10 CFR 50.73(a)(2)(v)(D)

Docket No.: 52-025

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

Southern Nuclear Operating Company
Vogtle Electric Generating Plant (VEGP) – Unit 3
Licensee Event Report 2022-002-00
Automatic Depressurization System Stage 4 Flow Paths Inoperable During Mode 6 with Upper
Internals in Place Due to Inadequate Work Processes

Ladies and Gentlemen:

In accordance with the requirements of 10 CFR 50.73(a)(2)(i)(B) and 10 CFR 50.73(a)(2)(v)(D), Southern Nuclear Operating Company is submitting the enclosed Licensee Event Report for VEGP Unit 3.

This letter contains no regulatory commitments. If you have questions regarding the enclosed information, please contact Will Garrett at (706) 848-7154.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "P. Martino", written over a horizontal line.

Patrick A. Martino
Site Vice President, Unit 3

PAM/NBC/sfr

Enclosure: Unit 3 Licensee Event Report 2022-002-00

cc:

Regional Administrator, Region II
VPO Project Manager
Senior Resident Inspector – Vogtle 3 & 4
Director, Environmental Protection Division - State of Georgia

Vogtle Electric Generating Plant - Unit 3

Licensee Event Report 2022-002-00

**Automatic Depressurization System Stage 4 Flow Paths Inoperable During
Mode 6 with Upper Internals in Place Due to Inadequate Work Processes**

Enclosure

Unit 3 Licensee Event Report 2022-002-00

NRC FORM 366 (08-2020)		U.S. NUCLEAR REGULATORY COMMISSION			APPROVED BY OMB: NO. 3150-0104		EXPIRES: 08/31/2023				
<div style="display: flex; justify-content: space-between; align-items: center;"> <div style="text-align: center;"> LICENSEE EVENT REPORT (LER) (See Page 3 for required number of digits/characters for each block) (See NUREG-1022, R.3 for instruction and guidance for completing this form http://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1022/r3/) </div> <div style="font-size: small;"> Estimated burden per response to comply with this mandatory collection request: 80 hours. Reported lessons learned are incorporated into the licensing process and fed back to industry. Send comments regarding burden estimate to the FOIA, Library, and Information Collections Branch (T-6 A10M), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by e-mail to Infocollections.Resource@nrc.gov, and the OMB reviewer at: OMB Office of Information and Regulatory Affairs, (3150-0104), Attn: Desk ail: oir_submission@omb.eop.gov. The NRC may not conduct or sponsor, and a person is not required to respond to, a collection of information unless the document requesting or requiring the collection displays a currently valid OMB control number. </div> </div>											
1. Facility Name Vogtle Electric Generating Plant, Unit 3					2. Docket Number 05000 "05200025"		3. Page 1 OF 2				
4. Title Automatic Depressurization System Stage 4 Flow Paths Inoperable During Mode 6 with Upper Internals in Place Due to Inadequate Work Processes											
5. Event Date			6. LER Number			7. Report Date			8. Other Facilities Involved		
Month	Day	Year	Year	Sequential Number	Revision No.	Month	Day	Year	Facility Name	Docket Number	
10	23	2022	2022	- 002 -	00	12	19	2022		05000	
									Facility Name	Docket Number	
										05000	
9. Operating Mode						10. Power Level					
6						000					
11. This Report is Submitted Pursuant to the Requirements of 10 CFR §: (Check all that apply)											
10 CFR Part 20		<input type="checkbox"/> 20.2203(a)(2)(vi)		<input type="checkbox"/> 50.36(c)(2)		<input type="checkbox"/> 50.73(a)(2)(iv)(A)		<input type="checkbox"/> 50.73(a)(2)(x)			
<input type="checkbox"/> 20.2201(b)		<input type="checkbox"/> 20.2203(a)(3)(i)		<input type="checkbox"/> 50.46(a)(3)(ii)		<input type="checkbox"/> 50.73(a)(2)(v)(A)		10 CFR Part 73			
<input type="checkbox"/> 20.2201(d)		<input type="checkbox"/> 20.2203(a)(3)(ii)		<input type="checkbox"/> 50.69(g)		<input type="checkbox"/> 50.73(a)(2)(v)(B)		<input type="checkbox"/> 73.71(a)(4)			
<input type="checkbox"/> 20.2203(a)(1)		<input type="checkbox"/> 20.2203(a)(4)		<input type="checkbox"/> 50.73(a)(2)(i)(A)		<input type="checkbox"/> 50.73(a)(2)(v)(C)		<input type="checkbox"/> 73.71(a)(5)			
<input type="checkbox"/> 20.2203(a)(2)(i)		10 CFR Part 21		<input checked="" type="checkbox"/> 50.73(a)(2)(i)(B)		<input checked="" type="checkbox"/> 50.73(a)(2)(v)(D)		<input type="checkbox"/> 73.77(a)(1)(i)			
<input type="checkbox"/> 20.2203(a)(2)(ii)		<input type="checkbox"/> 21.2(c)		<input type="checkbox"/> 50.73(a)(2)(i)(C)		<input type="checkbox"/> 50.73(a)(2)(vii)		<input type="checkbox"/> 73.77(a)(2)(i)			
<input type="checkbox"/> 20.2203(a)(2)(iii)		10 CFR Part 50		<input type="checkbox"/> 50.73(a)(2)(ii)(A)		<input type="checkbox"/> 50.73(a)(2)(viii)(A)		<input type="checkbox"/> 73.77(a)(2)(ii)			
<input type="checkbox"/> 20.2203(a)(2)(iv)		<input type="checkbox"/> 50.36(c)(1)(i)(A)		<input type="checkbox"/> 50.73(a)(2)(ii)(B)		<input type="checkbox"/> 50.73(a)(2)(viii)(B)					
<input type="checkbox"/> 20.2203(a)(2)(v)		<input type="checkbox"/> 50.36(c)(1)(ii)(A)		<input type="checkbox"/> 50.73(a)(2)(iii)		<input type="checkbox"/> 50.73(a)(2)(ix)(A)					
<input type="checkbox"/> OTHER (Specify here, in abstract, or NRC 366A).											
12. Licensee Contact for this LER											
Licensee Contact Will Garrett, VEGP 3&4 Site Licensing Manager								Phone Number (include area code) 7068487154			
13. Complete One Line for each Component Failure Described in this Report											
Cause	System	Component	Manufacturer	Reportable to IRIS	Cause	System	Component	Manufacturer	Reportable to IRIS		
14. Supplemental Report Expected						15. Expected Submission Date			Month	Day	Year
<input checked="" type="checkbox"/> No						<input type="checkbox"/> Yes (If yes, complete 15. Expected Submission Date)					
16. Abstract (Limit to 1560 spaces, i.e., approximately 15 single-spaced typewritten lines)											
On October 23, 2022, at 0405 EDT with Vogtle Electric Generating Plant (VEGP) Unit 3 in Mode 6 at 0 percent power, the Automatic Depressurization System (ADS) Stage 4 Squib Valve Component Interface Modules (CIMs) were discovered in "local" control while preparing to return ADS Stage 4 Division A to service, which rendered the associated ADS Stage 4 flow paths inoperable. The operators responded timely by placing all ADS Stage 4 Squib Valve CIMs in "remote" to restore operability to the ADS Stage 4 flow paths. The root cause of the event was inadequate work processes. The corrective actions completed for this event include revision of the mode change checklist procedure GOP-301 and reinforcement of configuration management with maintenance work planners. This event is reportable under 10 CFR 50.73(a)(2)(i)(B) as a condition prohibited by Technical Specifications and 10 CFR 50.73(a)(2)(v)(D) as a condition that could have prevented the fulfillment of the safety function. VEGP Units 1, 2, and 4 were unaffected by this event.											

**LICENSEE EVENT REPORT (LER)
CONTINUATION SHEET**

(See NUREG-1022, R.3 for instruction and guidance for completing this form
<http://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1022/r3/>)

Estimated burden per response to comply with this mandatory collection request: 80 hours. Reported lessons learned are incorporated into the licensing process and fed back to industry. Send comments regarding burden estimate to the FOIA, Library, and Information Collections Branch (T-6 A10M), U. S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by e-mail to Infocollects.Resource@nrc.gov, and the OMB reviewer at: OMB Office of Information and Regulatory Affairs, (3150-0104), Attn: Desk Officer for the Nuclear Regulatory Commission, 725 17th Street NW, Washington, DC 20503; e-mail: oir_submission@omb.eop.gov. The NRC may not conduct or sponsor, and a person is not required to respond to, a collection of information unless the document requesting or requiring the collection displays a currently valid OMB control number.

1. FACILITY NAME	2. DOCKET NUMBER	3. LER NUMBER		
Vogtle Electric Generating Plant, Unit 3	05000- "05200025"	YEAR	SEQUENTIAL NUMBER	REV NO.
		2022	002	00

NARRATIVE**EVENT DESCRIPTION**

On October 23, 2022, at 0405 EDT with Vogtle Electric Generating Plant (VEGP) Unit 3 in Mode 6 at 0 percent power, the Automatic Depressurization System (ADS) Stage 4 Squib Valve [EIS: AB / V] Component Interface Modules (CIMs) [EIS: JE / IMOD] were discovered in "local" control, which rendered the associated ADS Stage 4 flow paths inoperable. Based on the CIMs being in "local," the ADS Stage 4 valves were inoperable when the unit entered the mode of applicability for Technical Specifications (TS) Limiting Condition for Operation (LCO) 3.4.13. The applicability of TS LCO 3.4.13 is Mode 6 with upper internals in place, which occurred on October 22, 2022, at 1430 hours. Therefore, the placement of the upper internals resulted in the unit being in a condition prohibited by the TS, because TS 3.4.13 requires three flow paths in ADS Stage 4 to be operable in Mode 6 with the upper internals in place. The CIMs had been previously placed in "local" control for installation of the ADS Stage 4 squib valve actuator cartridges. The ADS Stage 4 CIMs being in "local" control was discovered while preparing to return ADS Stage 4 Division A to service on October 23, 2022. The CIMs being in "local" control would have prevented the automatic open function for these valves. This resulted in a condition where no Stage 4 ADS flow paths were operable during plant conditions that required at least three operable flow paths (i.e., Mode 6 with Upper Internals in place in accordance with TS 3.4.13). The operators responded timely by placing the CIMs in "remote" for ADS Stage 4 Divisions A and C at 0432 EDT, and the CIMs for Divisions B and D were placed in "remote" at 0447 EDT, which restored operability to the required ADS Stage 4 flow paths and established compliance with the TS LCO 3.4.13. This event is reportable under 10 CFR 50.73(a)(2)(i)(B) as a condition prohibited by Technical Specifications and 10 CFR 50.73(a)(2)(v)(D) as a Safety System Functional Failure (SSFF).

EVENT ANALYSIS

The root cause of this event was determined to be inadequate work processes. Procedures did not include a step to check CIM configuration prior to mode changes and procedural guidance was not in place to identify CIM status as part of TS compliance verification. Additionally, maintenance work control documents did not address restoration of the CIMs.

REPORTABILITY AND SAFETY ASSESSMENT

There were no safety consequences due to this event because during the time that the ADS Stage 4 flow paths were inoperable, there was no irradiated fuel in the core and no decay heat present. No radiological release occurred due to this event. Under alternate conditions, such as the presence of decay heat, manual actuation of ADS Stage 4 via the Diverse Actuation System (DAS) could have been utilized to open the valves. This event is reportable under 10 CFR 50.73(a)(2)(i)(B) as a condition prohibited by Technical Specifications and 10 CFR 50.73(a)(2)(v)(D) as a condition that could have prevented the fulfillment of the safety function, due to the condition of having no ADS Stage 4 flow paths operable during the TS mode of applicability.

CORRECTIVE ACTIONS COMPLETED

- The mode change checklist procedure GOP-301 was revised to check CIM configuration prior to entry into applicable modes.
- Reinforced with Planning and Procedure writers the importance and process for ensuring configuration control is restored to normal position.

PREVIOUS SIMILAR EVENTS

None