Southern Nuclear

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ND-23-0001

10 CFR 50.73(a)(2)(i)(B)
10 CFR 50.73(a)(2)(v)(D)
10 CFR 50.73(a)(2)(vii)(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 2022-002-01
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), 10 CFR 50.73(a)(2)(v)(D), and 10 CFR 50.73(a)(2)(vii)(D), Southern Nuclear Operating Company is submitting the enclosed revised Licensee Event Report for VEGP Unit 3.

This revision adds reporting criterion under 10 CFR 50.73(a)(2)(vii)(D).

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

Respectfully submitted,

Patrick A. Martino
Site Vice President, Unit 3

PAM/NBC/sfr

Enclosure: Revised Unit 3 Licensee Event Report 2022-002-01

Southern Nuclear

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cc:
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Director, Environmental Protection Division - State of Georgia

Vogtle Electric Generating Plant - Unit 3

Licensee Event Report 2022-002-01

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

Enclosure

Revised Unit 3 Licensee Event Report 2022-002-01

NRC FORM 366 (01-10-2023) U.S. NUCLEAR REGULATORY COMMISSION

APPROVED BY OMB: NO. 3150-0104 EXPIRES: 12/31/2023

LICENSEE EVENT REPORT (LER)

(See Page 2 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/)

1. Facility Name		2. Docket Number	3. Page
Vogtle Electric Generating Plant, Unit 3	☐ 050 ■ 052	00025	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	☐ 050	Docket Number
10	23	2022	2022	- 002 -	01	02	03	2023	Facility Name	☐ 052	Docket Number

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	☐ 20.2203(a)(2)(vi)	**10 CFR Part 50**	☐ 50.73(a)(2)(ii)(A)	☐ 50.73(a)(2)(viii)(A)	☐ 73.1200(a)
☐ 20.2201(b)	☐ 20.2203(a)(3)(i)	☐ 50.36(c)(1)(i)(A)	☐ 50.73(a)(2)(ii)(B)	☐ 50.73(a)(2)(viii)(B)	☐ 73.1200(b)
☐ 20.2201(d)	☐ 20.2203(a)(3)(ii)	☐ 50.36(c)(1)(ii)(A)	☐ 50.73(a)(2)(iii)	☐ 50.73(a)(2)(ix)(A)	☐ 73.1200(c)
☐ 20.2203(a)(1)	☐ 20.2203(a)(4)	☐ 50.36(c)(2)	☐ 50.73(a)(2)(iv)(A)	☐ 50.73(a)(2)(x)	☐ 73.1200(d)
☐ 20.2203(a)(2)(i)	**10 CFR Part 21**	☐ 50.46(a)(3)(ii)	☐ 50.73(a)(2)(v)(A)	**10 CFR Part 73**	☐ 73.1200(e)
☐ 20.2203(a)(2)(ii)	☐ 21.2(c)	☐ 50.69(g)	☐ 50.73(a)(2)(v)(B)	☐ 73.77(a)(1)	☐ 73.1200(f)
☐ 20.2203(a)(2)(iii)		☐ 50.73(a)(2)(i)(A)	☐ 50.73(a)(2)(v)(C)	☐ 73.77(a)(2)(i)	☐ 73.1200(g)
☐ 20.2203(a)(2)(iv)		☑ 50.73(a)(2)(i)(B)	☑ 50.73(a)(2)(v)(D)	☐ 73.77(a)(2)(ii)	☐ 73.1200(h)
☐ 20.2203(a)(2)(v)		☐ 50.73(a)(2)(i)(C)	☑ 50.73(a)(2)(vii)		

☐ **OTHER** (Specify here, in abstract, or NRC 366A).

12. Licensee Contact for this LER

Licensee Contact	Phone Number (Include area code)
Will Garrett, VEGP 3&4 Licensing Manager	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
☑ No	☐ Yes (If yes, complete 15. Expected Submission Date)				

16. Abstract (Limit to 1326 spaces, i.e., approximately 13 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, 10 CFR 50.73(a)(2)(v)(D) as a condition that could have prevented the fulfillment of the safety function, and 10 CFR 50.73(a)(2)(vii)(D) as an event where a single cause or condition caused at least two independent trains or channels to become inoperable in a single system designed to mitigate the consequences of an accident. 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/)

1. FACILITY NAME		2. DOCKET NUMBER	3. LER NUMBER		
			YEAR	SEQUENTIAL NUMBER	REV NO.
Vogtle Electric Generating Plant, Unit 3	☐ 050 ■ 052	00025	2022	- 002	- 01

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 [EIIS: AB / V] Component Interface Modules (CIMs) [EIIS: 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, 10 CFR 50.73(a)(2)(v)(D) as a Safety System Functional Failure (SSFF), and 10 CFR 50.73(a)(2)(vii)(D) as an event where a single cause or condition caused at least two independent trains or channels to become inoperable in a single system designed to mitigate the consequences of an accident.

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, 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, and 10 CFR 50.73(a)(2)(vii)(D) as an event where a single cause or condition caused at least two independent trains or channels to become inoperable in a single system designed to mitigate the consequences of an accident.

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