

# ENERGY NORTHWEST

P.O. Box 968 ■ Richland, Washington 99352-0968

January 17, 2000  
GO2-00-012

Docket No. 50-397

U.S. Nuclear Regulatory Commission  
Document Control Desk  
Washington, DC 20555

Gentlemen:

Subject: **WNP-2, OPERATING LICENSE NPF-21,  
LICENSEE EVENT REPORT NO. 1999-003-00**

Transmitted herewith is Licensee Event Report No. 1999-003-00 for WNP-2. This report is submitted voluntarily because it is a condition that might be of generic interest or concern. The report discusses items of reportability, corrective action taken, and action to preclude recurrence.

Should you have any questions or desire additional information regarding this matter, please call me or Mr. PJ Inserra at (509) 377-4147.

Respectfully,



RL Webring  
Vice President, Operations Support/PIO  
Mail Drop PE08

Attachment

cc: EW Merschoff - NRC-RIV  
JS Cushing - NRC-NRR  
INPO Records Center  
NRC Sr. Resident Inspector - 927N (2)  
DL Williams - BPA/1399  
TC Poindexter - Winston & Strawn

*JE221*

**LICENSEE EVENT REPORT (LER)**

<b>FACILITY NAME (1)</b> Washington Nuclear Plant - Unit 2	<b>DOCKET NUMBER (2)</b> 50-397	<b>PAGE (3)</b> 1 OF 3
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**TITLE (4)**  
**Voluntary Licensee Event Report of failure to comply with the Technical Specification Bases description of a Channel Check**

EVENT DATE (5)			LER NUMBER (6)			REPORT DATE (7)			OTHER FACILITIES INVOLVED (8)	
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REV. NUMBER	MONTH	DAY	YEAR	FACILITY NAME	DOCKET NUMBER
10	22	1999	1999	003	00	1	17	2000	FACILITY NAME	DOCKET NUMBER

<b>OPERATING MODE</b>	2	<b>THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more) (11)</b>								
		20.402(b)	20.405(c)	50.73(a)(2)(iv)	73.71(b)					
<b>POWER LEVEL</b>	0%	20.405(a)(1)(i)	50.36(c)(1)	50.73(a)(2)(v)	73.71(c)					
		20.405(a)(1)(ii)	50.36(c)(2)	50.73(a)(2)(vii)	OTHER					
		20.405(a)(1)(iii)	50.73(a)(2)(i)	50.73(a)(2)(viii)(A)	X					
		20.405(a)(1)(iv)	50.73(a)(2)(ii)	50.73(a)(2)(viii)(B)						
		20.405(a)(1)(v)	50.73(a)(2)(iii)	50.73(a)(2)(x)						

**LICENSEE CONTACT FOR THIS LER (12)**

<b>NAME</b> F. A. Schill, Licensing Technical Specialist	<b>TELEPHONE NUMBER (Include Area Code)</b> (509) 377-2269
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COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO EPIX	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO EPIX

<b>SUPPLEMENTAL REPORT EXPECTED (14)</b>				<b>EXPECTED</b>			<b>MONTH</b>	<b>DAY</b>	<b>YEAR</b>
YES (If yes, completed EXPECTED SUBMISSION DATE).	X	NO							

**ABSTRACT:**

On October 22, 1999 at 1309 hours, with the plant in mode 2 and power ascension in progress following the R-14 refueling outage, plant operators questioned the adequacy of the method in which a surveillance activity was being performed. Technical Specifications Surveillance Requirement (SR) 3.3.5.2.1 requires a 12-hour Channel Check for the Condensate Storage Tank (CST) [KA] level-low function. This function automatically transfers the Reactor Core Isolation Cooling (RCIC) [BN] system suction from the CST to the suppression pool when low CST level is sensed. The Channel Check for this function is performed by verifying the status of the CST level-low alarm is consistent with indications on independent CST level instruments. This method meets the Technical Specifications definition of a Channel Check; however, it is inconsistent with the Technical Specifications Bases description for SR 3.3.5.2.1 which states that performance of a Channel Check will ensure that a gross failure of instrumentation has not occurred. The Bases description does not apply to the non-indicating design of the instrumentation that performs the CST level-low function for the RCIC system.

Immediate corrective action was taken to declare the RCIC CST level instruments inoperable and configure the RCIC system to take suction from the suppression pool. Further corrective actions are to revise the Bases for SR 3.3.5.2.1.

The cause of this event is failure to include deletion of SR 3.3.5.2.1 for the CST level-low function in the deviations from NUREG 1434 when the Improved Technical Specifications (ITS) were implemented at WNP-2.

There are no safety consequences associated with this event. The Technical Specifications permit the current configuration of the RCIC system for an indefinite period of time and the CST is still available as a source of water if needed. This voluntary report is submitted due to the generic interest this condition may hold for the staff and other licensees.

**LICENSEE EVENT REPORT (LER)**

**Voluntary Licensee Event Report of failure to comply with the Technical Specification Bases description of a Channel Check**

FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)			PAGE (3)
Washington Nuclear Plant Unit 2	50-397	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	2 OF 3
		99	003	00	

TEXT (If more space is required, use additional copies of NRC Form 366A) (17)

Event Description

On October 22, 1999 at 1309 hours, with the plant in mode 2 and power ascension in progress following the R-14 refueling outage, plant operations personnel questioned the adequacy of the method in which a Channel Check surveillance activity was being performed. Technical Specifications Surveillance Requirement (SR) 3.3.5.2.1 requires a 12-hour Channel Check for the Condensate Storage Tank (CST) [KA] level-low function. This function automatically transfers the Reactor Core Isolation Cooling (RCIC) [BN] system suction from the CST to the suppression pool when low CST level is sensed. The Channel Check for this function is performed by verifying that the status of the CST level-low alarm is consistent with independent CST level indicating instruments. The Technical Specifications Bases description for SR 3.3.5.2.1 states that performance of a Channel Check will ensure that a gross failure of instrumentation has not occurred. Because a gross failure of the instrument channel, such as a stuck displacer or open circuit would not be detected by this Channel Check method, it is inconsistent with the Technical Specifications Bases description. Technical Specifications defines a Channel Check as the qualitative assessment by observation, of channel behavior that shall include, where possible, comparison of the channel indication or status to other indications or status from independent instrument channels measuring the same parameter. This definition is consistent with the method in which SR 3.3.5.2.1 for the RCIC function is performed.

Immediate Corrective Action

Immediate corrective action was taken to declare the RCIC CST level instruments inoperable and issue instructions to control room supervisory personnel to declare the RCIC system inoperable whenever its suction is lined up to the CSTs. Because the RCIC function of the level instruments was declared inoperable, the RCIC system was configured to take suction from the suppression pool.

Further Evaluation

This voluntary report is submitted with respect to the Statement of Considerations for 10 CFR 50.73 which encourages licensees to report any event or condition that might be of generic interest or concern. The Technical Specification Bases description of SR 3.3.5.2.1 originated from NUREG 1434, the BWR/6 Standard Technical Specifications. Although WNP-2 is a BWR/5 design, NUREG 1434 was adopted by WNP-2 during implementation of Improved Technical Specifications (ITS). Many Channel Check SRs were deleted when NUREG 1434 was adapted for the WNP-2 ITS. These deletions were justified because the current WNP-2 design does not provide indication in the deleted instrument channels. The Channel Check deletions were accepted in the staff's Safety Evaluation Report because verification of the status of an alarm every 12 hours does not provide any further information to the operators that is not constantly available through the absence of an alarm. This event may be of generic interest to the staff and to other licensees who are in the process of transitioning to ITS at their facilities.

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		99	003	00	

TEXT (If more space is required, use additional copies of NRC Form 366A) (17)

Root Cause

The cause of this event is failure to include deletion of SR 3.3.5.2.1 for the CST level-low function in the deviations from NUREG 1434 when Channel Checks were deleted during implementation of the ITS at WNP-2.

Further Corrective Action

The following further corrective actions are planned:

- 1) Revise the Technical Specifications Bases for the identified Channel Check SRs to provide descriptions that are consistent with the design of the instrumentation.
- 2) Initiate a Technical Specifications amendment request to delete Channel Check SR 3.3.5.2.1.

Assessment of Safety Consequences

There are no safety consequences associated with this event because the Technical Specifications permit the current configuration of the RCIC system for an indefinite period of time and the CSTs are still available as a source of water if needed.

Similar Events

There have been no previous similar events at WNP-2.