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SEP 11 2000

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Mail Station P1-137
Washington, DC 20555

SUSQUEHANNA STEAM ELECTRIC STATION
LICENSEE EVENT REPORT 50-387/00-009-00
PLA - 5239 FILE R41-2

Docket No. 50-387
License No. NPF-14

Attached is Licensee Event Report 50-387/00-009-00. This report is being made pursuant to 10.CFR50.73(a)(2)(i)(B) in that it was discovered that the surveillance requirements for Technical Specification 3.6.1.3 had not been adequately performed on certain manual valves in Susquehanna SES Units 1 and 2.

Bryce L. Shriver
Vice President – Nuclear Site Operations

Attachment

cc: Mr. H. J. Miller
Regional Administrator
U. S. Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, PA 19406

cc: Mr. S. L. Hansell
Sr. Resident Inspector
U.S. Nuclear Regulatory Commission
P. O. Box 35
Berwick, PA 18603-0035

IE22

LICENSEE EVENT REPORT (LER)

(See reverse for required number of digits/characters for each block)

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS MANDATORY INFORMATION COLLECTION REQUEST: 50.0 HRS. REPORTED LESSONS LEARNED ARE INCORPORATED INTO THE LICENSING PROCESS AND FED BACK TO INDUSTRY. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE INFORMATION AND RECORDS MANAGEMENT BRANCH (T-6 F33), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555-0001, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

FACILITY NAME (1)
Susquehanna Steam Electric Station - Unit 1

DOCKET NUMBER (2)
05000387

PAGE (3)
1 OF 3

TITLE (4)
Primary Containment Boundary Valves Not Checked Per Surveillance Requirement

EVENT DATE (5)			LER NUMBER (6)			REPORT DATE (7)			OTHER FACILITIES INVOLVED (8)	
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	MONTH	DAY	YEAR	FACILITY NAME	DOCKET NUMBER
08	10	00	00	-- 009	-- 00	09	11	00	Susquehanna SES - Unit 2	05000388
									FACILITY NAME	DOCKET NUMBER
										05000

OPERATING MODE (9)	POWER LEVEL (10)	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more) (11)				
1	100	20.2201(b)	20.2203(a)(2)(v)	<input checked="" type="checkbox"/>	50.73(a)(2)(i)	50.73(a)(2)(viii)
		20.2203(a)(1)	20.2203(a)(3)(ii)		50.73(a)(2)(iii)	50.73(a)(2)(x)
		20.2203(a)(2)(i)	20.2203(a)(3)(iii)		50.73(a)(2)(iii)	73.71
		20.2203(a)(2)(ii)	20.2203(a)(4)		50.73(a)(2)(iv)	OTHER
		20.2203(a)(2)(iii)	50.36(c)(1)		50.73(a)(2)(v)	Specify in Abstract below or in NRC Form 366A
		20.2203(a)(2)(iv)	50.36(c)(2)		50.73(a)(2)(vii)	

LICENSEE CONTACT FOR THIS LER (12)

NAME Gerard M. Machalick - Senior Engineer, Licensing	TELEPHONE NUMBER (Include Area Code) 570 / 542-3861
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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

SUPPLEMENTAL REPORT EXPECTED (14)				EXPECTED SUBMISSION DATE (15)	MONTH	DAY	YEAR
YES (If yes, complete EXPECTED SUBMISSION DATE).				<input checked="" type="checkbox"/> NO			

ABSTRACT (Limit to 1400 spaces, i.e., approximately 15 single-spaced typewritten lines) (16)

While Unit 1 and Unit 2 were operating at 100% power on August 10, 2000, engineering personnel identified that 87 Unit 1 and 85 Unit 2 primary containment boundary valves (instrument line vent and drain valves, and test connections on containment side of inboard primary containment isolation valves) had not been included in required surveillance testing. Decisions made previously to exclude the subject valves from surveillance requirements were based on a narrow definition of the terms associated with containment boundary components. Systems which are extensions of containment require any penetrations on that system to be included in surveillance requirements for containment penetrations. These events are reportable per 10CFR50.73(a)(2)(i)(B), Technical Specification Prohibited Operation or Condition, in that all valves required to be surveilled per Technical Specification 3.6.1.3 were not included in surveillance activities. All subject valves were surveilled and no leakage paths were identified. The valves have historically been controlled by administrative means and are infrequently operated. The significance of the event is low, and the health and safety of the public was not compromised. Corrective actions include revising Unit 1 and Unit 2 surveillance procedures to include the subject valves, clarifying the definitions associated with the Technical Specifications pertaining to primary containment components and a comprehensive review of containment boundary components and applicable surveillance requirements.

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

FACILITY NAME (1)	DOCKET	LER NUMBER (6)			PAGE (3)
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	
Susquehanna Steam Electric Station - Unit 1	05000				2 OF 3
	387	00	-- 009	-- 00	

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

EVENT DESCRIPTION

While Unit 1 and Unit 2 were operating at 100% power on August 10, 2000, engineering personnel (utility, non-licensed) identified that 87 Unit 1 and 85 Unit 2 primary containment boundary valves (EIS Code: NH) had not been included in required surveillance testing. All valves are 1" diameter or less. Surveillance Requirement 3.6.1.3.2 requires the following action every 31 days: "Verify each primary containment isolation manual valve and blind flange that is located outside primary containment and not locked, sealed, or otherwise secured, and is required to be closed during accident conditions is closed". The valves identified in this event fall into two categories. The first category is vent, drain, and test connection valves on instrument lines connected to primary containment atmosphere (74 Unit 1 valves, 72 Unit 2 valves). The original design of these systems credited in-line excess flow check valves for isolation from primary containment if needed. It was later recognized that the excess flow check valves could not provide the necessary isolation for air systems. A subsequent evaluation for how to treat the systems as extensions of containment wrongly concluded that the surveillance requirements for primary containment manual isolation valves did not apply to these instrument lines (and any penetrations of those lines, i.e. vent and drain valves) since the lines are not required to be isolated from containment during accident conditions. The second category of valves is test connections and vent valves which connect on the containment side of inboard automatic isolation valves (13 valves – each unit). The inboard valve on each test connection is closed and locked. This subset of valves was not identified for surveillance requirement applicability, possibly due to a similar interpretation of terminology associated with primary containment components and requirements.

CAUSE OF EVENT

The cause of the event is unclear definitions of terminology of the components associated with primary containment surveillance requirements. As an example, a decision made to exclude some of the subject valves from surveillance requirements was based on a narrow definition of the term "penetration" to apply only to the location where the systems passed through the containment wall. Systems which are extensions of containment require any penetrations on that system to be included in surveillance requirements for containment penetrations.

SAFETY SIGNIFICANCE

These events are reportable per 10CFR50.73(a)(2)(i)(B), Technical Specification Prohibited Operation or Condition, in that all valves required to be surveilled per Technical Specification 3.6.1.3 were not included in the surveillance procedure. All 172 valves were surveilled when the condition was identified, and no leakage paths were identified. The valves have historically been controlled by administrative means; valve checklists or I&C calibration procedures, and are infrequently operated. The significance of the event is low, and the health and safety of the public was not compromised.

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

FACILITY NAME (1)	DOCKET	LER NUMBER (6)			PAGE (3)	
Susquehanna Steam Electric Station - Unit 1	05000	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	3 OF 3	
	387	00	-- 009	-- 00		

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

CORRECTIVE ACTIONS

Corrective actions that have been completed are:

- The operability of primary containment was restored by surveilling the subject valves.
- Unit 1 and Unit 2 surveillance procedures were revised to include the valves in subsequent surveillance activities.

Corrective actions which remain to be completed are:

- Revise the Technical Specification Bases for TS 3.6.1.3 to clarify the appropriate Action statement in the event that the subject valves fail to meet the Surveillance Requirement.
- Clarify the terminology associated with the Technical Specifications for primary containment boundary components.
- Perform a comprehensive review of all primary containment boundary components, in accordance with the clarifications of the previous action.
- Implement appropriate changes to TS/TS Bases/TRM, based on results of the above actions.

ADDITIONAL INFORMATION

Past Similar Events: Docket No. 50/387 LER 00-001-00
 Docket No. 50/387 LER 98-002-00
 Docket No. 50/387 LER 97-005-01

Failed Component: None