Northern States Power Company

Monticello Nuclear Generating Plant
2807 West Hwy 75
Monticello, Minnesota 55362-9637

October 13, 2000

10 CFR Part 50
Section 50.73

US Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

MONTICELLO NUCLEAR GENERATING PLANT
Docket No. 50-263 License No. DPR-22

LER 2000-010, Revision 1

Technical Specification Surveillance Requirement for Containment Isolation Valves Not Performed

Revision 1 to the Licensee Event Report for this occurrence is attached. This report contains no new NRC commitments.

Please contact Mohamad Marashi at (763) 295-1425 if you require further information.

Byron Day
Plant Manager
Monticello Nuclear Generating Plant

c: Regional Administrator - III NRC
NRR Project Manager, NRC
Sr Resident Inspector, NRC
Minnesota Department of Commerce
Attachment

IE22

NRC FORM 366 (6-1998) U.S. NUCLEAR REGULATORY COMMISSION

LICENSEE EVENT REPORT (LER)

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

APPROVED BY OMB NO. 3150-0104 EXPIRES 06/30/2001
Estimated burden per response to comply with this mandatory information collection request: 50 hrs. Reported lessons learned are incorporated into the licensing process and fed back to the industry. Forward comments regarding burden estimate to the Records Management Branch(T-6 F33), U.S. Nuclear Regulatory Commission, Washington, DC 205555-0001, and to the Paperwork Reduction Project (3150-0104), Office of Management and Budget, Washington, DC 20503. If an information collection does not display a currently valid OMB control number, the NRC may not conduct or sponsor, and a person is not required to respond to the information collection.

FACILITY NAME (1)	DOCKET NUMBER (2)	PAGE (3)
MONTICELLO NUCLEAR GENERATING PLANT	05000 – 263	1 OF 4

TITLE (4)
Technical Specification Surveillance Requirement for Containment Isolation Valves Not Performed

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 05000
06	08	00	00	-- 010 --	01	07	7	00	FACILITY NAME	DOCKET NUMBER 05000

OPERATING MODE (9)	N	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more) (11)							
			20.2201(b)		20.2203(a)(2)(v)	X	50.73(a)(2)(i)		50.73(a)(2)(viii)
POWER LEVEL (10)	100 %		20.2203(a)(1)		20.2203(a)(3)(i)		50.73(a)(2)(ii)		50.73(a)(2)(x)
			20.2203(a)(2)(i)		20.2203(a)(3)(ii)		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	TELEPHONE NUMBER (Include Area Code)
Mohamad Marashi	763-295-1425

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).	X	NO				

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

On June 8, 2000, while operating at 100% power, it was determined that MO-2026 and MO-2027, reactor head spray outboard and inboard isolation valves, even though closed, should have been declared inoperable (i.e., it had not been demonstrated that the valves meet criteria that assure automatic closure capability). Technical Specification 4.7.D.2 requires that the position of at least one fully closed valve in each line having an inoperable automatic containment isolation valve be recorded daily. This surveillance requirement had not been met for MO-2026 and MO-2027.

MO-2026 and MO-2027 were declared inoperable and were deactivated by isolating power. Daily position status logging was initiated. A Technical Specification revision will be submitted to clearly state that an automatic containment isolation valve that is deactivated in the closed position is considered operable. The corresponding specification in the Standard Specifications, NUREG-1433, will be considered in the proposed Technical Specification revision.

Description

In response to Generic Letter 96-05, Periodic Verification of Design Basis Capability of Safety Related Motor-Operated Valves, dated March 13, 1997, Monticello established a program for controlling applicable safety related motor operated valves (MOV). This program requires that either,

a) the system (or train) be declared inoperable when the MOV is in a non-safety position,

or,

b) adequate confidence be provided in the capability of the MOV to return to its safety position under design-basis accident conditions.

The compliance strategy selected for MO-2026 and MO-2027, reactor head spray outboard and inboard isolation valves, was to declare the valves inoperable when they were in the open non-safety position. These valves are closed during power operation.

On June 8, 2000, while operating at 100% power, it was determined that for the purposes of meeting the intent of Technical Specifications associated with primary containment automatic isolation valves, MO-2026 and MO-2027, even though closed, should have been declared inoperable (i.e., it had not been demonstrated that the valves meet criteria that assure automatic closure capability). Technical Specification 4.7.D.2 requires that the position of at least one fully closed valve in each line having an inoperable automatic containment isolation valve be recorded daily. This surveillance requirement had not been met for MO-2026 and MO-2027.

Event Analysis

Analysis of Reportability

This report is being submitted in accordance with 10 CFR 50.73(a)(2)(i)(B): "Any operation or condition prohibited by the plant's Technical Specifications."

Although this event represents a condition prohibited by the Technical Specifications, primary containment integrity was maintained. When MO-2026 and MO-2027 are in their closed position, they have fulfilled their safety function as containment isolation valves. These valves do not have an open safety function. The event is therefore not reportable in accordance with 10 CFR 50.73(a)(2)(v).

[1] EIIS System Code = ISV

Safety Significance

The reactor pressure interlock for shutdown cooling supply isolation prevents MO-2026 and MO-2027 from opening when reactor pressure is above 75 psig. Therefore, when reactor pressure was above 75 psig, MO-2026 and MO-2027 were effectively deactivated in the closed safe position. These valves could be open for head spray use during reactor shutdown when the reactor pressure is below 75 psig and the reactor water temperature is above 212°F. A review of the control room log for operational times of MO-2026 and MO-2027 during reactor shutdowns since March 1997 was performed. It was concluded that MO-2026 and MO-2027 were not opened when the reactor temperature was greater than 212°F.

For these reasons, this event had no effect on the health and safety of the public.

Cause

The unique Technical Specification surveillance requirements for containment automatic isolation valves were not recognized when the compliance strategy for MO-2026 and MO-2027 in response to GL 96-05 was selected.

Actions

Immediate Actions:

MO-2026 and MO-2027 were declared inoperable and were deactivated by isolating power. Daily position status logging was initiated.

Corrective Action:

A Technical Specification revision will be submitted to clearly state that an automatic containment isolation valve that is deactivated in the closed position is considered operable. The corresponding specification in the Standard Specifications, NUREG-1433, will be considered in the proposed Technical Specification revision.

The primary containment Technical Specifications were reviewed with the GL 96-05 program engineers.

Status of other similarly affected valves was reviewed. No other similar issues were identified.

Failed Component Identification

None

Similar Events In the Last Ten Years

None.