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10 CFR 50.73

ComEd

October 19, 2000

PSLTR: #00-0149

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

Dresden Nuclear Power Station, Unit 3
Facility Operating License No. DPR-25
NRC Docket No. 50-249

Subject: Licensee Event Report 2000-005-00, "Technical Specification Non Compliance due to Primary Containment B Inboard and Outboard Main Steam Isolation Valves Exceeding Local Leak Rate Test Allowable Limits"

Enclosed is Licensee Event Report 2000-005-00, "Technical Specification Non Compliance due to Primary Containment B Inboard and Outboard Main Steam Isolation Valves Exceeding Local Leak Rate Test Allowable Limits," for the Dresden Nuclear Power Station (DNPS). This condition is being reported pursuant to 10 CFR 50.73 (a)(2)(ii)(B), which requires the reporting of any operation or condition prohibited by the plant's Technical Specifications.

Determination of the root cause for this event is in progress. A supplemental report will be submitted upon completion of the root cause determination. Both the inboard and outboard primary containment main steam isolation valves described in this report were inspected, repaired and tested satisfactorily.

Any other actions described in the submittal represent intended or planned actions by DNPS. They are described for the NRC's information and are not regulatory commitments.

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If you have any questions, please contact Dale Ambler, Dresden Regulatory Assurance Manager at (815) 942-2920 extension, 3800.

Respectfully,

Preston Swafford

Preston Swafford
Site Vice President
Dresden Nuclear Power Station

Enclosure

cc: Regional Administrator – NRC Region III
NRC Senior Resident Inspector – Dresden Nuclear Power Station

NRC FORM 366 (6-1998) U.S. NUCLEAR REGULATORY COMMISSION	APPROVED BY OMB NO. 3150-0104 EXPIRES 06/30/2001
LICENSEE EVENT REPORT (LER)	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 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. 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)
Dresden Nuclear Power Station, Unit 3	05000249	1 of 3

TITLE (4)
Technical Specification Non Compliance due to Primary Containment B Inboard and Outboard Main Steam Isolation Valves Exceeding Local Leak Rate Test Allowable Limits

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 N/A	DOCKET NUMBER N/A
09	20	2000	2000	005	00	10	19	2000	FACILITY NAME N/A	DOCKET NUMBER N/A

OPERATING MODE (9)	5	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)	0		20.2203(a)(I)		20.2203(a)(3)(I)	X	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)	X	50.73(a)(2)(v)		Specify in Abstract below or in NRC Form 366A
			20.2203(a)(2)(iv)		50.36(c)(2)	X	50.73(a)(2)(vii)		

LICENSEE CONTACT FOR THIS LER (12)

NAME	TELEPHONE NUMBER (Include Area Code)
Richard A. Kelly, Regulatory Assurance	(815) 942-2920 Ext. 2924

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
X	SB	ISV	C665	Y					

SUPPLEMENTAL REPORT EXPECTED (14)				EXPECTED SUBMISSION DATE (15)	MONTH	DAY	YEAR
X	YES (If yes, complete EXPECTED SUBMISSION DATE).		NO		03	16	2001

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

On September 20, 2000, at 1830 hours, with Unit 3 shutdown for Refuel Outage D3R16, the Primary Containment Outboard Main Steam Isolation Valve 3-0203-2B failed the as found local leak rate test (LLRT) during performance of Dresden Operating Surveillance (DOS) 7000-02, “Local Leak Rate Testing Of Main Stream Isolation Valves (Wet Test).” Subsequently, an informational leak test of the Inboard Main Steam Isolation Valve 3-0203-1B identified high leakage. The total leakage through the two valves was declared to be undetermined placing the unit in a condition prohibited by the Technical Specifications. The safety significance of the leakage through the primary containment isolation valves is considered to be minimal. Both valves were inspected, repaired and tested satisfactorily prior to the completion of D3R16. The final determination of the failure mode of the valves is currently in-progress. A supplement will be submitted to report the final root cause of the valve failures and the corrective actions taken.

PLANT AND SYSTEM IDENTIFICATION:

General Electric – Boiling Water Reactor - 2527 MWt rated core thermal power

Energy Industry Identification System (EIIS) Codes are identified in the text as [XX] and are obtained from IEEE Standard 805-1984, IEEE Recommended Practice for System Identification in Nuclear Power Plants and Related Facilities.

EVENT IDENTIFICATION:

Technical Specification Non Compliance due to Primary Containment B Inboard and Outboard Main Steam Isolation Valves Exceeding Local Leak Rate Test Allowable Limits

A. PLANT CONDITIONS PRIOR TO EVENT:

Unit: 3	Event Date: 09-20-2000	Event Time: 18:30
Reactor Mode: 5	Mode Name: Refuel	Power Level: 0
Reactor Coolant System Pressure: 0 psig		

B. DESCRIPTION OF EVENT:

This LER is being submitted pursuant to 10 CFR 50.73 (a)(2)(i)(B), which requires the reporting of any operation or condition prohibited by the plant's Technical Specifications (TS). In addition, this LER is also being submitted pursuant to 10 CFR 50.73(a)(2)(ii), 10 CFR 50.73(a)(2)(v), and 10 CFR 50.73(a)(2)(vii).

On September 20, 2000, at 1830 hours, with Unit 3 shutdown for Refuel Outage D3R16, the Primary Containment Outboard Main Steam [SB] Isolation Valve (MSIV) 3-0203-2B failed the as found local leak rate test (LLRT) during performance of Dresden Operating Surveillance (DOS) 7000-02, "Local Leak Rate Testing Of Main Steam Isolation Valves (Wet Test)." Subsequently, an informational leak test of the Inboard MSIV 2-0203-1B identified high leakage. The amount of leakage through the two valves was declared to be undetermined. Based on the undetermined amount of leakage, the requirements of Technical Specification 3.7.D,"Primary Containment Isolation Valves", were not met placing the unit in a condition prohibited by the Technical Specifications.

Upon the discovery of the failures, the valves were disassembled and inspected. The results of these inspections were as follows:

The 3-0203-1B valve had two washout indications on the seat in the seating area at the 10:00 and 2:00 positions. Additionally, all four lower liner welds were found to be cracked and the liner had rotated approximately 8 inches. When machining was performed, two low spots were identified on the seat.

The 3-0203-2B valve lower liner belleville washer had a minor indication. Additionally, two radial indications were found on the main seat.

The main disc assembly, for both valves, which includes the pilot disc and seat were removed and replaced.

The 3-0203-1B MSIV main seat was repaired, the liner modification installed and the valve tested satisfactorily. The 3-0203-2B MSIV main seat was lapped and the valve tested satisfactorily.

C. CAUSE OF EVENT:

The confirmed cause of the excessive leakage for the valves is unknown at this time. It is believed that the MSIVs were partially opened and reseated without their full closing force (air assist) prior to LLRT tests. This manipulation sequence was accomplished to satisfy an Out of Service (OOS) requirement to support a planned Group 1 Logic

System Functional Test prior to LLRT testing. It is believed that the MSIV manipulations placed the main seating surfaces in a configuration different than what would have been during a postulated accident event. A supplemental report will be submitted upon completion of the root cause determination.

D. SAFETY ANALYSIS

The safety significance of indeterminate leakage past the B line inboard and outboard MSIVs during the D3R16 testing is assessed to be minimal. The preliminary results of the root cause investigation are that the MSIVs were partially opened and reseated without their full closing force (i.e., air assist) prior to LLRT tests. This manipulation sequence was accomplished to satisfy an Out of Service (OOS) requirement to support a planned Group 1 Logic System Functional Test prior to LLRT testing. It is believed that the MSIV manipulations placed the main seating surfaces in a configuration different than that expected during a postulated accident. Based on the leak rate history and the results of the internal inspection of the 2B MSIV, it is assessed that the B steam line outboard MSIV would have properly seated. Additionally, the valve would have exhibited a low leakage rate consistent with meeting the Technical Specification and dose analysis requirements had it been closed with its normal closing force during an accident condition. As a result, the safety significance of this event was minimal.

E. CORRECTIVE ACTIONS:

The 3-0203-1B valve was repaired and tested satisfactorily. (Complete)

The 3-0203-2B valve was repaired and tested satisfactorily. (Complete)

Determination of the root cause of the failure for the 3-0203-1B and 3-0203-2B valves is in progress. A supplemental report will be submitted upon completion of the root cause determination.

F. PREVIOUS OCCURRENCES:

LER/Docket Numbers	Title
98-004-00/05000237	Outboard Main Steam Line Isolation Valves 2-203-2B And 2-203-2D As-found Leakage Rates Exceeded Technical Specification Limit
98-004-01/05000237	Supplement to Outboard Main Steam Line Isolation Valves 2-203-2B And 2-203-2D As-found Leakage Rates Exceeded Technical Specification Limit

G. COMPONENT FAILURE DATA:

Manufacturer	Nomenclature	Model Number	Mfg. Part Number
Crane Co.	Unit 3 1B Inboard MSIV	DR34289-20" 3-0203-1B Y Pattern Globe Valve	N/A
Crane Co.	Unit 3 2B Outboard MSIV	DR34289-20" 3-0203-2B Y Pattern Globe Valve	N/A