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10 CFR 50.73

January 19, 2001

PSLTR: #01-0008

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

Dresden Nuclear Power Station, Unit 2  
Facility Operating License No. DPR-19  
NRC Docket No. 50-237

Subject: Licensee Event Report 2001-001-00, "Primary Containment Isolation System Valve Adjusted During VOTES Test with No LLRT Performed"

Enclosed is Licensee Event Report 2001-001-00, "Primary Containment Isolation System Valve Adjusted During VOTES Test with No LLRT Performed," for the Dresden Nuclear Power Station (DNPS). This condition is being reported 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.

The following actions were taken:

The valve was re-tested, and returned to the previously established seating force.

A review of the current schedule was performed to verify that no work packages will perform thrust adjustments to 10 CFR 50 Appendix J, "Primary Reactor Containment Leakage Testing for Water-Cooled Power Reactors", valves without the LLRT requirements being addressed.

This correspondence contains the following new commitment:

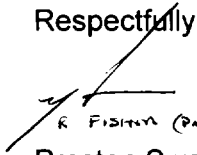
Revise the appropriate VOTES procedure to include LLRT allowable thrust adjustments to MOVs included in the 10 CFR 50 Appendix J Program.

IE22

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.

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

Respectfully,



R. SWAFFORD (Pm Full Time)

Preston Swafford  
Site Vice President  
Dresden Nuclear Power Station

Enclosure

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

**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 (1-6 133), 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)  
**Dresden Nuclear Power Station, Unit 2**

DOCKET NUMBER (2)  
**05000237**

PAGE (3)  
**1 of 3**

TITLE (4)  
**Primary Containment Isolation System Valve Adjusted During VOTES Test with No LLRT Performed**

EVENT DATE (5)			LER NUMBER (6)			REPORT DATE (7)			OTHER FACILITIES INVOLVED (8)	
MON TH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	MONTH	DAY	YEAR	FACILITY NAME	DOCKET NUMBER
12	21	2000	2001	001	00	01	19	2001	N/A	N/A
									N/A	N/A

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)	X	50.73(a)(2)(i)		50.73(a)(2)(viii)		
		20.2203(a)(l)		20.2203(a)(3)(l)		50.73(a)(2)(ii)		50.73(a)(2)(x)		
		20.2203(a)(2)(l)		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: **Timothy P. Heisterman, Regulatory Assurance**  
 TELEPHONE NUMBER (Include Area Code): **(815) 942-2920 Ext. 3324**

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)		
YES	X	NO		MONTH	DAY	YEAR
(If yes, complete EXPECTED SUBMISSION DATE)						

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

On December 19, 2000, during the performance of a plant work request, "VOTES" testing was performed on Motor Operated Valve (MOV) 2-1402-25B in accordance with appropriate plant procedures. During the performance of this test the closing torque switch setting on this MOV was raised, resulting in an increase in thrust of about 20.4%. This change in torque switch settings resulted in the valve becoming inoperable due to the fact that a change in the torque switch setting of this magnitude potentially affects the leakage rate of the valve.

On December 21, 2000, the MOV Engineer identified that Local Leakage Rate Testing (LLRT) had been performed on this MOV in the past. The engineer immediately recognized that this MOV had recently been adjusted on December 19, 2001, and suspected that no LLRT had been performed. Subsequent investigation revealed that the As Found and As Left LLRT required by the 10CFR50 Appendix J, "Primary Reactor Containment Leakage Testing for Water-Cooled Power Reactors", program had not been performed. The 2-1402-25B was declared inoperable, and Technical Specification (TS) 3.7.D was entered.

The 2-1402-25B MOV was then re-tested and returned to the previously established seating force. This eliminated the need to perform an As Left LLRT for this MOV. The MOV was then returned to service, and the LCO exited.

Corrective actions include, the valve being re-tested, and returned to the previously established seating force, a review of the current schedule was performed to verify that no work packages will perform thrust adjustments to 10 CFR 50 Appendix J, "Primary Reactor Containment Leakage Testing for Water-Cooled Power Reactors", valves without the LLRT requirements being addressed and revise appropriate VOTES procedure to include LLRT allowable thrust adjustments to Appendix J MOVs.

**LICENSEE EVENT REPORT (LER)**

FACILITY NAME (1)	DOCKET (2)	LER NUMBER (6)			PAGE (3)
Dresden Nuclear Power Station, Unit 2	05000237	YEAR 2001	SEQUENTIAL NUMBER 001	REVISION NUMBER 00	2 OF 3

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

**PLANT AND SYSTEM IDENTIFICATION:**

General Electric – Boiling Water Reactor – 2527 MWt rated core thermal power  
Energy Industry Identification System (EIIIS) 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:**

Primary Containment Isolation System Valve Adjusted During VOTES Test with No LLRT Performed

**A. PLANT CONDITIONS PRIOR TO EVENT:**

Unit: 2	Event Date: 12-21-2000	Event Time: 1533
Reactor Mode: 1	Mode Name: Power Operation	Power Level: 100%
Reactor Coolant System Pressure: 1000 psig		

**B. DESCRIPTION OF EVENT:**

This condition is being reported 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.

On December 19, 2000, during the performance of a plant work request, VOTES testing was performed on Motor Operated Valve (MOV) 2-1402-25B in accordance with plant procedures. During the performance of this test the closing torque switch on this MOV was raised, resulting in an increase in thrust of about 20.4 percent.

On December 21, 2000, during a post job review of the work package, the MOV engineer identified that the incorrect thrust window values were placed in the work package. Note: These settings did not change the outcome of the VOTES test. While writing Condition Report for the error with the thrust window values, the MOV Engineer identified that a previous LLRT was associated with this valve. The engineer immediately recognized that this MOV had recently been adjusted on December 19, 2001 and suspected that no LLRT had been performed. Thrust changes greater than 5 percent result in the potential to change leakage rates and therefore are required to be tested in accordance with the 10 CFR 50 Appendix J Program. Subsequent investigation revealed that the As Found and As Left LLRT required by the 10CFR50 Appendix J program had not been performed. The change in torque switch settings resulted in the valve becoming inoperable due to the fact that a change in the torque switch setting could affect the leakage rate of the valve. Operations was notified and Valve 2-1402-25B was declared inoperable, and appropriate Technical Specification action statements were entered

TS 3.7.D.1 requires with one or more primary containment isolation valve(s) inoperable, maintain at least one isolation valve OPERABLE in each affected penetration that is open and within 4 hours either: a) Restore the the inoperable valve(s) to OPERABLE status, or b) Isolate each affected penetration by use of at least one deactivated automatic valve secured in the isolated position, or c) Isolate each affected penetration by use of at least one closed manual valve or blind flange.

Due to the delay in recognizing the LLRT requirements associated with the original MOV thrust setting, the required Limiting Condition for Operation (4 hours) was exceeded, placing the plant in a condition prohibited by the plant's Technical Specifications. On December 21, 2000, the VOTES test was re-performed on this MOV. This test restored the seating thrust value to within 5% of the seating force noted prior to the last As Left LLRT test. The valve was subsequently declared operable upon completion of the test.

**LICENSEE EVENT REPORT (LER)**

FACILITY NAME (1)	DOCKET (2)	LER NUMBER (6)			PAGE (3)
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	
<b>Dresden Nuclear Power Station, Unit 2</b>	<b>05000237</b>	<b>2001</b>	<b>001</b>	<b>00</b>	<b>3 OF 3</b>

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

**C. CAUSE OF EVENT:**

The Root Cause is the lack of adequate precautions within the test procedure with regard to testing PCIS valves. If adequate precautions had been present in the work procedure, it would have noted this motor operated valve as an LLRT valve. (NRC Cause Code D)

**D. SAFETY ANALYSIS**

The purpose of the 2-1402-25B valve is to open in order to prevent over-pressurization of the core spray discharge piping, and to close in order to maintain core spray system integrity. This MOV also has a containment isolation function. The 2-1402-25B valve had adequate capability to perform all of its other design basis functions. Therefore, the core spray system itself was not inoperable until Technical Specification 3.7.D was entered on December 21, 2000. This valve was then repaired within the normal LCO window. Since the other MOV in series with this valve was still functioning, a complete loss of containment integrity did not occur.

The increase in thrust did not affect the valve's ability to open if the Core Spray System was needed for injection. The Core Spray System remained available and, therefore the Core Damage Frequency was not affected by this event.

Based upon this evaluation, the safety significance of this event has been determined to be minimal.

**E. CORRECTIVE ACTIONS:**

The valve was re-tested, and returned to the previously established seating force. (Complete)

A review of the current schedule was performed to verify that no work packages will perform thrust adjustments to Appendix J valves without the LLRT requirements being addressed. (Complete)

Revise the appropriate VOTES procedure to include LLRT allowable thrust adjustments to MOVs included in the 10 CFR 50 Appendix J Program. (ATI #41146)

**F. PREVIOUS OCCURRENCES:**

None

**G. COMPONENT FAILURE DATA:**

None