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Ref: 10CFR50.73(a)(2)(i)(B)

CPSES-200101030
Log # TXX-01080
File # 10200

May 7, 2001

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

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)
UNIT 1
DOCKET NO. 50-445
CONDITIONS PROHIBITED BY TECHNICAL SPECIFICATIONS
LICENSEE EVENT REPORT 445/01-002-00

Gentlemen:

Enclosed is Licensee Event Report (LER) 01-002-00 for Comanche Peak Steam Electric Station Unit 1, "Primary Plant Ventilation System Negative Pressure Boundary Test Has Been Performed Non-Conservatively With The Ventilation System Supply Units' Pneumatic Dampers In The Closed Position."

IE22

There are no new licensing based commitments in this communication. However, an internal commitment to revise the procedures was identified, this commitment will be tracked via our commitment tracking program.

Sincerely,

C. L. Terry

By: D. R. Woodlan
Docket Licensing Manager

OAB/oab
Enclosure

cc: Mr. E. W. Merschoff, Region IV
Mr. D. N. Graves, Region IV
Resident Inspectors, CPSES

NRC FORM 366 (1-2001) U.S. NUCLEAR REGULATORY COMMISSION

LICENSEE EVENT REPORT (LER)

Facility Name (1)	Docket Number (2)	Page (3)
COMANCHE PEAK STEAM ELECTRIC STATION UNIT 1	05000445	1 OF 4

Title (4)
PRIMARY PLANT VENTILATION SYSTEM NEGATIVE PRESSURE BOUNDARY TEST HAS BEEN PERFORMED NON-CONSERVATIVELY WITH THE VENTILATION SUPPLY UNITS' PNEUMATIC DAMPERS IN THE CLOSED POSITION

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 Numbers
									CPSES UNIT 2	05000446
03	07	01	01	002	00	05	07	01		05000

Operating Mode (9): 1

Power Level (10): 100

This report is submitted pursuant to the requirements of 10 CFR : (Check all that apply) (11)

20.2201(b)	20.2203(a)(3)(i)	50.73(a)(2)(i)(C)	50.73(a)(2)(vii)
20.2201(d)	20.2203(a)(3)(ii)	50.73(a)(2)(ii)(A)	50.73(a)(2)(viii)(A)
20.2203(a)(1)	20.2203(a)(4)	50.73(a)(2)(ii)(B)	50.73(a)(2)(viii)(B)
20.2203(a)(2)(i)	50.36(c)(2)(i)(A)	50.73(a)(2)(iii)	50.73(a)(2)(ix)(A)
20.2203(a)(2)(ii)	50.36(c)(1)(ii)(A)	50.73(a)(2)(iv)(A)	50.72(a)(2)(x)
20.2203(a)(2)(iii)	50.36(c)(2)	50.73(a)(2)(v)(A)	73.71(a)(4)
20.2203(a)(2)(iv)	50.46(a)(3)(ii)	50.73(a)(2)(v)(B)	73.71(a)(5)
20.2203(a)(2)(v)	50.73(a)(2)(i)(A)	50.73(a)(2)(v)(C)	OTHER
20.2203(a)(2)(vi) X	50.73(a)(2)(i)(B)	50.73(a)(2)(v)(D)	Specify in Abstract below or in NRC Form 366A

Licensee Contact For This LER (12)

Name	Telephone Number (Include Area Code)
JEFF J. LAMARCA - SMART TEAM 2 ENGINEERING MANAGER	254-897-6688

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
				N					

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 March 7, 2001 during a review of the Primary Plant Ventilation System (PPVS) engineering surveillance test procedures, surveillance testing personnel (utility, non-licensed) noted that the PPVS supply fan pneumatic intake dampers were being tested in the "closed" position instead of the "open" position. The dampers are designed to "fail open on loss of instrument air", and have been tested in the closed position since unit start-up. On March 8, 2001, test was conducted with the correct line-up, i.e., dampers in the open position, with acceptable results.

The cause of the event was deemed to be less than adequate procedures. Immediate actions were to perform the test with the dampers in the correct position. The applicable procedures will be revised to require the dampers to be in the open position when the test is to be performed.

LICENSEE EVENT REPORT (LER)

Facility Name (1)	Docket	LER Number (6)			Page(3)
		Year	Sequential Number	Revision Number	
COMANCHE PEAK STEAM ELECTRIC STATION UNIT 1	05000445	01	002	00	2 OF 4

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

I. DESCRIPTION OF THE REPORTABLE EVENT

A. REPORTABLE EVENT CLASSIFICATION

This Licensee Event Report is submitted to report a condition prohibited by plant's Technical Specification pursuant to the requirements of 10CFR50.73 (a)(2)(i)(B).

B. PLANT OPERATING CONDITIONS PRIOR TO THE EVENT

On March 7, 2001, when this issue was discovered, Comanche Peak Steam Electric Station (CPSES) Unit 1 was in Mode 1, Power Operations, and CPSES Unit 2 was in Mode 1, Power Operations.

C. STATUS OF STRUCTURES, SYSTEM OR COMPONENTS THAT WERE INOPERABLE AT THE START OF THE EVENT AND THAT CONTRIBUTED TO THE EVENT

There were no other inoperable structures, systems or components that contributed to event.

D. NARRATIVE SUMMARY OF THE EVENT, INCLUDING DATES AND APPROXIMATE TIMES

The Primary Plant Ventilation System (PPVS) serves the areas housing Engineered Safety Features (ESF) equipment as well as the radwaste areas and the fuel handling and storage areas. The PPVS supply consists of eight non-safety related, primary plant supply fans (30,000 scfm each) with individual intake dampers, and shares common discharge ductwork with two non-safety related, ventilation equipment room supply fans. The PPVS exhaust consists of twelve non-ESF filtration units and fans (15,000 scfm each), four ESF filtration units and fans (15,000 scfm each), and two non-safety related, ventilation equipment room exhaust fans. The PPVS is a normally operating system, aligned to bypass the ESF High-Efficiency Particulate Air (HEPA) filters and charcoal adsorbers. During emergency operations, the PPVS non-ESF fans are stopped and ESF fans are started to begin filtration. Upon receipt of the actuating signal, the stream of ventilation air discharges through the ESF filter trains. The demisters remove any entrained water droplets present, to prevent excessive loading of the HEPA filters and charcoal adsorbers.

On March 7, 2001 during a review of the PPVS engineering surveillance test procedures, surveillance testing personnel (utility, non-licensed) noted that PPVS was being tested with the PPVS supply fan pneumatic intake dampers in the "closed" position instead of the "open" position. The dampers are designed to "fail open on loss of instrument air" and, the PPVS has been tested with the dampers in the closed position since unit start-up.

On March 8, 2001, the test was conducted with the correct line-up i.e., dampers in the open position. Results from the March 8, 2001, were acceptable and no system degradation was noted.

E. METHOD OF DISCOVERY OF EACH COMPONENT OR SYSTEM FAILURE OR PROCEDURAL ERROR

On March 7, 2001 during a review of the PPVS engineering surveillance test procedures, surveillance testing personnel (utility, non-licensed) noted that PPVS was being tested with the PPVS supply fan pneumatic intake dampers in the "closed" position instead of the "open" position. The dampers are designed to "fail open on loss of instrument air" and, the PPVS has been tested with the dampers in the closed position since unit start-up.

II. ANLYSIS OF THE EVENT

A. SAFETY SYSTEMS THAT RESPONDED

Not applicable – there were no safety system responses associated with this event.

B. DURATION OF SAFETY SYSTEM INOPERABILITY

Not applicable – there were no safety systems rendered inoperable due to this event.

C. SAFETY CONSEQUENCES AND IMPLICATIONS OF THE EVENT

The purpose of negative pressure testing for the primary plant ventilation system is to verify the capabilities of the buildings and their components to maintain a negative pressure in the Auxiliary, Safeguards, and Fuel Buildings. During the post accident mode of operation, the PPVS is designed to maintain a slight negative pressure in the Auxiliary, Fuel and Safeguards buildings, with respect to adjacent areas, to prevent unfiltered leakage. The acceptance criterion of ± 0.05-inch water gauge relative to atmospheric pressure was selected as a reasonable measure of the integrity of the negative pressure boundary. The frequency of 18 months is consistent with the guidance provided in NUREG-0800, Section 6.5.1 and is performed on a staggered test basis.

Based on a review of test results with the PPVS supply fan and non-operating ESF filtration unit pneumatic dampers failed in the "open" position when compared to the historical results with the dampers tested in the "closed" position, the results were similar. Hence, it is reasonable to assume the PPVS system would have functioned as designed to maintain a negative pressure within the building structures and prevent radioactive contaminates from escaping the buildings to the outside atmosphere.

Therefore, it was concluded that this event did not adversely impact the safe operation of CPSES or the health and safety of public.

III. CAUSE OF THE EVENT

In the conservative accident analyses performed at CPSES, instrument air is not assumed to be available post accident. As such, the valves are assumed to fail open. The test configuration in the procedure did not recognize this conservative assumption and tested with the valves closed. Hence, the cause of the subject reportable event was deemed to be less than adequate procedures.

IV. CORRECTIVE ACTIONS

Immediate actions were to perform the test with the dampers in the in the correct position. The applicable procedures will be revised to require the dampers to be in the open position when the test is to be performed.

V. PREVIOUS SIMILAR EVENTS

There have been other previous events which resulted in less than adequate surveillances. However, the causes of those events are sufficiently different than this such that the corrective actions taken for the previous events would have not prevented recurrence.