Indiana Michigan Power Company 500 Circle Drive Buchanan, MI 49107 1395



March 28, 2002

United States Nuclear Regulatory Commission Document Control Desk Washington, DC 20555

> Operating Licenses DPR-74 Docket Nos. 50-316

Document Control Manager:

In accordance with the criteria established by 10 CFR 50.73 entitled <u>Licensee Event Report</u> <u>System</u>, the following report is being submitted:

LER 316/2002-001-00: "Containment Isolation Valve Alignment Error during Local Leak Rate Testing"

No new commitments are identified in this submittal.

Should you have any questions regarding this correspondence, please contact Mr. Gordon P. Arent , Manager, Regulatory Affairs, at 616/697-5553.

Sincerely,

Enic A Jarsen

Joseph E. Pollock Site Vice President

JM/pae

Attachment

C:

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- G. P. Arent A. C. Bakken
- L. Brandon
- J. E. Dyer, Region III
- R. W. Gaston
- S. A. Greenlee
- T. P. Noonan
- R. P. Powers
- M. W. Rencheck
- R. Whale

NRC Resident Inspector

Records Center, INPO

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U.S. NUCLEAR REGULATORY COMMISSION

#### LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

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

#### **Conditions Prior to Event**

Unit 1 - 100 percent power Unit 2 - MODE 6

#### **Description of Event**

On January 26, 2002, during reactor core offload for refueling outage 13, 10 CFR 50 Appendix J, Type B and C leak rate testing was being performed in accordance with procedure 02-EHP-4030-234-203, "Unit 2 B & C Leak Rate." Step 53 of the procedure provided valve lineup instructions for Type C leak rate testing of the nitrogen to pressurizer relief tank check valve 2-N-159. The auxiliary equipment operator (AEO) who preformed the valve lineup for testing signed off the procedure step indicating that the root shutoff valve 2-GPX-301-V1 from the nitrogen supply manifold was "closed" as required by procedure. Upon successful completion of the test, the procedure requires a valve restoration lineup. The test was not impacted by the mispositioned valve. A different AEO who performed the restoration for the valve lineup noticed that valve 2-GPX-301-V1 was in the "open" position, thereby creating a potential direct access from the containment atmosphere to the outside atmosphere. Upon discovery, the control room was notified and core alteration was suspended

A post event investigation of this incident revealed that the AEO who performed the initial valve line up for testing observed that valve 2-GPX-301-V1 was tagged "Do Not Operate Without SRO CA Permission" as required by procedure 02-OHP-4030-STP-041 for refueling integrity purposes. This AEO had been involved with previous testing that required the lifting of STP-041 tags. On January 26, 2002, the AEO performed the lineup which required valve 2-GPX-301-V1 to remain closed. He had a mind set from the previous day's activities that he needed to remove the STP 41 tag and open the valve. The AEO inappropriately removed the tag and opened the valve without verifying the required position of the valve for testing.

Technical Specification (TS) requirement 3.9.4.c requires that each containment penetration providing direct access from the containment atmosphere to the outside atmosphere be either closed by an isolation valve, blind flange, manual valve, or equivalent. The failure to verify valve 2-GPX-301-V1 closed during core alteration resulted in a breach of refueling containment integrity. This breach of refueling integrity is prohibited by TS and is therefore reportable in accordance with 50.73(a)(2)(i)(B).

# **Cause of Event**

The cause of this event was failure to follow procedures. The AEO who performed the lineup for B & C leak rate testing opened valve 2-GPX-301-VI and inappropriately pulled the "Do Not Operate" tag from the valve contrary to the requirements of plant procedures 02-EHP-4030-234-203 and 02-OHP-4030.STP.041.

# **Analysis of Event**

The Bases for TS 3.9.4.c states that the requirements on containment building penetration closure and operability ensure that a release of radioactive material within the containment will be restricted from leakage to the environment. The operability and closure restrictions are sufficient to restrict radioactive material release from a fuel element rupture based upon the lack of containment pressurization potential while in refueling mode.

Based on investigation of this incident the valve was mispositioned for approximately 10 hours. There was no impact on the health and safety of the public as a result of this event.

# **Corrective Actions**

Upon discovery Operations restored valve 2-GPX-301-V1 to the closed position thereby re-establishing refueling integrity.

A review of the completed B & C testing lineups impacting refueling integrity was conducted and verified that no other loss of containment integrity had occurred during previous refueling operations.

VRC FORM 366A U.S. NUCLEAR REGULATORY ( 7-2001)	COMMISSION					
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7. TEXT (If more space is required, use additional copies of	NRC Form (366A)					
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