Exelon Generation Dresden Generating Station 6500 North Dresden Road www.exeloncorp.com



10 CFR 50.73

May 22, 2002

Morris, IL 60450-9765 Tel 815-942-2920

RHLTR: #02-0034

U.S. Nuclear Regulatory Commission ATTN: Document Control Desk Washington, DC 20555-0001

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

Subject: Licensee Event Report 2002-001-00, "HPCI Not in Standby Operation When Required by the Technical Specifications."

Enclosed is Licensee Event Report 2002-001-00, "HPCI Not in Standby Operation When Required by the Technical Specifications," for the Dresden Nuclear Power Station (DNPS). This event is being reported in accordance with 10 CFR 50.73(a)(2)(i)(B), "Any operation or condition which was prohibited by the plant's Technical Specifications."

Corrective Actions include:

Provide Operator training on this event and applicable sections of Technical Specifications regarding section 3.0 compliance.

Personnel involved were coached and counseled as to the requirements and interface with Limiting Conditions of Operation in Technical Specification section 3.0.

Reviewed all Technical Specifications Limiting Condition of Operation Applicability sections to identify any sections that could cause a similar event.

Historical operations policy questions will be reviewed to determine if additional training is required to ensure TS compliance.

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If you have any questions, please contact Bob Rybak, Regulatory Assurance Manager at (815) 416-2800.

Respectfully,

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R. J. Hovey ' 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 U.S. NUCLEAR REGULATORY COMMISSION LICENSEE EVENT REPORT (LER) 1. FACILITY NAME Dresden Nuclear Power Station Unit 3						APPROVED BY OMB NO. 3150-0104 EXPIRES 7-31-2004 Estimated burden per response to comply with this mandatory information collection request: 50 hours. Reported lessons learned are incorporated into the licensing process and fed back to industry. Send comments regarding burden estimate to the Records Management Branch (T-6 E6), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by internet e-mail to bjs1@nrc.gov, and to the Desk Officer, Office of Information and Regulatory Affairs, NEOB-10202 (3150-0104), Office of Management and Budget, Washington, DC 20503. If a means used to impose 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. 2. DOCKET NUMBER 3. PAGE 05000249 1 of 3								
4. TITLE HPCI Not in Standby Operation when Required by the Technical Specifications														
5	. EVENT DAT	E	6. LER NUMBER 7. F				REPORT	DATE	8. OTHER FACILITIES INVOLVED					
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				12.	LICE	NSEE C	CONTA	CT FOR TI	HIS	LER				
NAME									TELEPHONE NUMBER (Include Area Code)					
Timothy P. Heisterman						(815) 416-2815								
13. COMPLETE ONE LINE FOR EACH COMPONENT FAILU							URE DESCRIBED IN THIS REPORT							
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16. ABSTRACT (Limit to 1400 spaces, i.e., approximately 15 single-spaced typewritten lines)

On March 23, 2002, at 1603 hours, during reactor startup from a Unit 3 maintenance outage (D3M09), the High Pressure Coolant Injection (HPCI) system was not aligned to standby conditions when reactor steam dome pressure exceeded 150 psig. Technical Specification 3.5.1 requires HPCI to be operable in Modes 1, 2 and 3 when reactor steam dome pressure is >/= 150 psig. Significant maintenance had been performed on the HPCI system during D3M09. This maintenance required the performance of the low pressure HPCI run to validate operability. The operating crew believed HPCI was not operable until the low-pressure run was completed. They also believed there was a 12-hour allowance for HPCI to be inoperable above 150 psig to perform this test. Based on this belief, Operations personnel allocated resources to other activities that were required to be completed prior to reaching the reactor conditions that would support the low-pressure HPCI test, thus the HPCI 3-2301-4 and 3-2301-5 valves (steam supply) were left closed in preparation for the low pressure run.

The isolation valves would have opened upon receipt of an initiation signal and HPCI would have started. Additionally, Low Pressure Coolant Injection and Core Spray systems were in standby and would have injected upon receipt of an initiation signal. Therefore, the safety significance of this event is minimal.

NRC FORM 366A U.S. NUCLE COMMISSION	NRC FORM 366A U.S. NUCLEAR REGULATORY			APPROVED BY OMB NO. 3150-0104 EXPIRES 07/31/2004				
(7-2001) LICENSEE EVENT REPORT TEXT CONTINUATION	Estimated burden per response to comply with this mandatory informatic collection request: 50 hrs. Reported lessons learned are incorporated into the licensing process and fed back to industry. Forward comments regard burden estimate to the information and Records Management Branch (f33), U.S. Nuclear Regulatory Commission, Washington, DC 20555-001 and to the Paperwork Reduction Project (3150-0104), Office Of Management And Budget, Washington, DC 20503. If an information collection does a display a currently valid OMB control number, the NRC may not conduct sponsor, and a person is not required to respond to, the information collection to the information and a person is not required to respond to.							
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(If more space is required, use additional copies of NRC Form 366A)(17)

A. <u>Plant Conditions Prior to Event</u>:

Unit: 03Event Date: 03-23-2002Reactor Mode: 2Mode Name: StartupReactor Coolant SystemPressure: 150 psig

Event Time: 1603 CST Power Level: 002 percent

B. <u>Description of Event</u>:

This event is being reported in accordance with 10 CFR 50.73 (a)(2)(i)(B), which requires reporting "any operation or condition which was prohibited by the plant's Technical Specifications."

On March 15, 2002, Unit 3 was shut down to replace seventeen jet pump hold down beams. During the maintenance outage, extensive work was performed on the High Pressure Coolant Injection (HPCI) [BJ] system. The post maintenance tests (PMT) required a low pressure HPCI surveillance to verify no leaks at system pressure.

On March 23, 2002, Unit 3 commenced a normal unit startup per station procedures. Prior to reactor pressure reaching 150 psig, the Unit Supervisor (US) declared the HPCI system inoperable and questioned whether the HPCI isolation valves, 3-2301-4 and 3-2301-5, were required to be open. This was questioned because the HPCI low-pressure test was scheduled to be performed at 165 psig with 2 turbine bypass valves open. The HPCI system was believed to be inoperable by the US due to the maintenance work performed during the outage. Technical Specification (TS) 3.5.1 "ECCS-Operating", requires HPCI to be operable in Modes 1, 2 and 3 when reactor steam dome pressure is >/= 150 psig. The US determined that the valves could remain closed. This was based on an incorrect assumption that the system was inoperable until the low-pressure test was completed. The US requested a peer check of his determination. The Operations Outage Manager, Shift Outage Manager and the augmented Senior Reactor Operator performed that peer check. Following the discussion, the 3-2301-4 and 3-2301-5 valves were left in the closed position until the unit had reached the test conditions.

Subsequently, the Shift Operations Superintendent (SOS) arrived while the HPCI low-pressure test was in progress. The SOS reviewed the unit logs and recognized the HPCI system was not aligned to a standby condition prior to the unit reaching 150 psig. The SOS directed the US to amend the log entry that HPCI was inoperable until it was successfully aligned and tested.

However, on March 25, 2002, a review by site Regulatory Assurance personnel concluded that TS 3.5.1 requires HPCI to be operable in Modes 1, 2 and 3 when reactor steam dome pressure is >/= 150 psig and the plant had operated in a condition that was prohibited by the plant's TS. The Operations decision to consider HPCI inoperable and raise pressure was an incorrect application of the Technical Specifications for this condition. The correct application for this situation is to assume operability after the maintenance work was performed, not enter any LCOs, and to validate that assumption by testing when suitable conditions exist.

C. <u>Cause of Event</u>:

The root cause of this event was a knowledge deficiency associated with HPCI applicability which was complicated by the historical aspects of a TS note and the understanding of intent. The individuals involved focused on the Surveillance Requirements and not the applicability section of the TS. When guestioned why the

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

focus was on the surveillance, both assumed HPCI operability would be proven during the testing. (NRC Cause Code E)

To understand how Dresden licensed individuals acquired this mindset, a review of past outages, previous TS questions, correspondence regarding plant commitments, and limiting condition of operation (LCO) practices was conducted. During previous outages (D2R14 and D3R14), DNPS performed a unit start up with HPCI uncoupled. When the unit reached 150 psig, a 12-hour LCO time clock was entered for testing. Once all testing was complete and HPCI re-coupled, unit start-up progressed. This investigation found a plant commitment letter and an operations policy question discussing this situation. Both state that the footnotes in previous TS 4.0.D allowed the site to extend the applicability for the required function. This guidance was performed to determine if similar issues existed for other TS sections. Based on this review, there are appropriate procedures and programs in place to prevent a similar event.

D. <u>Safety Analysis</u>:

The safety significance of this event is minimal. The plant was in startup at low reactor pressure (150-psig) during the period when the HPCI steam supply valves were closed. The Automatic Depressurization System, Isolation Condenser, Core Spray systems, and Low Pressure Coolant Injection system were operable and capable of performing their intended safety function.

E. <u>Corrective Actions</u>:

Provide Operator training on this event and applicable sections of Technical Specifications regarding section 3.0 compliance.

Personnel involved were coached and counseled as to the requirements and interface with Limiting Conditions of Operation in Technical Specification section 3.0.

Reviewed all Technical Specifications Limiting Condition of Operation Applicability sections to identify any sections that could cause a similar event.

Historical operations policy questions will be reviewed to determine if additional training is required to ensure TS compliance.

F. <u>Previous Occurrences</u>:

A search of previous history found that Dresden had started the unit up with the HPCI turbine uncoupled from the pump during D2R14 and D3R14. This would render the HPCI system inoperable and it is similar in that for both events, HPCI was inoperable during a change of condition.

G. <u>Component Failure Data</u>:

N/A