

NOP-LP-2001-01

Davis-Besse

CONDITION REPORT						CR Number 02-08038
TITLE: NRC LESSONS-LEARNED TASK FORCE REPORT CONTAINS INACCURATE INFORMATION						
	DISCOVERY DATE 10/11/2002	TIME NA	EVENT DATE 09/30/02	TIME NA	SYSTEM / ASSET# NA NA	
O R I G I N A T I O N	EQUIPMENT DESCRIPTION NA					
	<p>DESCRIPTION OF CONDITION and PROBABLE CAUSE (If known) Summarize any attachments. Identify what, when, where, why, how.</p> <p>Sections 3.2.1.1 (page 46) and 3.3.7 (pages 91 and 93-94) of the NRC RVH Degradation Lessons-Learned Task Force Report (LLTF) discuss the NRC/NRR's review of the License Amendment Request (LAR) No. 99-02 that was approved as License Amendment No. 234. This License Amendment, issued by the NRC/NRR Davis-Besse Project Manager on November 16, 1999, revised the Technical Specification (TS) requirements for TS 3/4.4.6.1, RCS Leakage - Leakage Detection Systems, aligning them with that of NRC NUREG-1430, B&W Improved Standard TS (ITS). This TS change was included with several other ITS changes in the License Amendment.</p> <p>The LLTF Report states on page 91, "A license amendment involving the relaxation of operability requirements associated with the RCS leakage detection system radiation monitors was issued without the licensing PM's [NRC/NRR Project Manager] knowledge that the radiation monitors were highly unreliable because of fouling from boric acid deposits and iron oxide". The LLTF Report states on page 94, in part, "...the PM was not aware that another symptom was the fouling of the radiation monitor filter elements. If the [NRC] guidance [to be familiar with all aspects of plant operating status] was implemented, then the PM may well have become aware of the containment radiation monitors' operability problems when the licensee submitted the proposed change". This LLTF Report discussion is inconsistent with information documented in the Toledo Edison Telephone Call Documentation Record (Form ED 6650-e), record number RAS-99-00748, that documents a call held between Davis-Besse and the NRC/NRR D-B Project Manager on October 27, 1999, titled "Containment Radiation Monitors RE 4597 AA and BA and Particulate Filters Plugging with Iron", approximately three weeks before the License Amendment was issued. During this call, the record states the NRC/NRR PM was told, in part, "...it was important that LAR 99-02 be issued by the NRC because it would reduce the number of Containment Radiation Monitors required to be operable," and "there was an ongoing problem with the particulate filters clogging up with iron and then needing to be changed out more frequently". The record states the NRC/NRR PM then brought up a similar past experience he had had at another plant where "boron corrosion of these [carbon bolts on instrumentation flanges] had caused iron to go into the atmosphere and then be picked up by the particulate monitor filters". The PM was told a summary of this phone call record containing the NRC/NRR PM's experience would be provided to Davis-Besse Plant Engineering, which was done.</p> <p>In addition to the above call, the NRC/NRR D-B Project Manager was informed of the particulate filter plugging and consequential inoperability concern on September 2, 1999 (RAS-99-00582), October 20, 1999 (RAS-99-00703), and November 2, 1999 (RAS-99-00796).</p> <p>Since the accuracy of the above information could affect the basis for the NRC's recommendation provided later in Appendix A (Recommendation No. 3.3.7(1)) and corrects an inaccuracy within the LLTF Report, this information should be formally provided to the NRC without delay.</p>					
IMMEDIATE ACTIONS TAKEN / SUPV COMMENTS (Discuss CORRECTIVE ACTIONS completed, basis for closure.) NA						
QUALITY ORGANIZATION USE ONLY Quality Org. Initiated <input type="checkbox"/> Yes Quality Org. Follow-up <input type="checkbox"/> Yes <input type="checkbox"/> No		IDENTIFIED BY (Check one) <input checked="" type="checkbox"/> Individual/Work Group <input type="checkbox"/> Supervision/Management		<input type="checkbox"/> Self-Revealed <input type="checkbox"/> Internal Oversight <input type="checkbox"/> External Oversight		ATTACHMENTS <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
ORIGINATOR WUOKKO, D	ORGANIZATION RA	DATE 10/14/2002	SUPERVISOR MCCLOSKEY, P	DATE 10/14/2002	PHONE EXT. 8450	

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Davis-Bease

<h1>CONDITION REPORT</h1>						CR Number 02-08038		
TITLE: NRC LESSONS-LEARNED TASK FORCE REPORT CONTAINS INACCURATE INFORMATION								
P L A N T	SRO REVIEW <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		EQUIPMENT OPERABLE <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A		EVALUATION REQUIRED <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		IMMEDIATE INVESTIGATION REQUIRED <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
							ORGANIZATION NOTIFIED N/A	
							MODE CHANGE RESTRAINT <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
O P E R A T I O N S	MODE ASSOCIATED TECH SPEC NUMBER(S)				ASSOCIATED LCO ACTION STATEMENT(S)			
					#2			
	DECLARED INOPERABLE (Date / Time) N/A		REPORTABLE? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Eval Required		One Hour N/A Four Hour N/A Eight Hour N/A Other N/A		APPLICABLE UNIT(S) <input checked="" type="checkbox"/> U1 <input type="checkbox"/> U2 <input type="checkbox"/> Both	
COMMENTS This CR documents inaccurate information in an NRC report. This CR does not affect operation of any system, structure, or component. As a result, Operable is marked N/A and reportable is checked N/A.								
Current Mode - Unit 1 DEF		Power Level - Unit 1 0%		Current Mode - Unit 2		Power Level - Unit 2		
SRO - UNIT 1 Stallard, A				SRO - UNIT 2 Lewls, A		DATE 10/17/2002		
CRPA / SUPV / MRB	CATEGORY / EVAL CF		ASSIGNED ORGANIZATION RA		DUE DATE		REPORTABLE? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> LER No.	
	TREND CODES Process / Activity / Cause Code(s) LP4 2050		Comp Type / ID (If Cause T or W)		Cause Org		REPORTABILITY REVIEWER	
							DATE	
	INVESTIGATION OPTIONS <input type="checkbox"/> Generic Implications <input type="checkbox"/> Part 21 <input type="checkbox"/> Maint Rule <input type="checkbox"/> OE Evaluation						CLOSED BY	
						DATE		