H. L. Sumner, Jr.
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SOUTHERN COMPANY
Energy to Serve Your World℠

December 1, 2004

Docket No.: 50-366

NL-04-2353

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

Edwin I. Hatch Nuclear Plant – Unit 2
Licensee Event Report
Failure to Restore Caution Tag on Service Air System
Resulted in Primary Containment Inoperability

Ladies and Gentlemen:

In accordance with the requirements of 10 CFR 50.73(a)(2)(i)(B) and 10 CFR 50.73(a)(2)(v)(C), Southern Nuclear Operating Company is submitting the enclosed Licensee Event Report concerning failure to restore a caution tag on a service air system which resulted in the primary containment being inoperable.

This letter contains no NRC commitments. If you have any questions, please advise.

Sincerely,

H. L. Sumner, Jr.

HLS/il/sdl

Enclosure: LER 2-2004-003

cc: Southern Nuclear Operating Company
Mr. J. T. Gasser, Executive Vice President
Mr. G. R. Frederick, General Manager – Plant Hatch
RTYPE: CHA02.004

U. S. Nuclear Regulatory Commission
Dr. W. D. Travers, Regional Administrator
Mr. C. Gratton, NRR Project Manager – Hatch
Mr. D. S. Simpkins, Senior Resident Inspector – Hatch

IE22

NRC FORM 366 (6-2004) U.S. NUCLEAR REGULATORY COMMISSION

APPROVED BY OMB: NO. 3150-0104 EXPIRES: 06/30/2007

Estimated burden per response to comply with this mandatory 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 and FOIA/Privacy Service Branch (T-5 F52), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by internet e-mail to infocollects@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 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.

LICENSEE EVENT REPORT (LER)

(See reverse for required number of digits/characters for each block)

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4. TITLE

Failure to Restore Caution Tag on Service Air System Resulted in Primary Containment Inoperability

5. EVENT DATE			6. LER NUMBER			7. REPORT DATE			8. OTHER FACILITIES INVOLVED	
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	MONTH	DAY	YEAR	FACILITY NAME	DOCKET NUMBER(S)
										05000
10	03	2004	2004	003	0	12	01	2004	FACILITY NAME	DOCKET NUMBER(S) 05000

9. OPERATING MODE	11. THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check all that apply)							
Mode 1		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)(1)(i)(A)		50.73(a)(2)(iii)		50.73(a)(2)(ix)(A)
10. POWER LEVEL		20-2203(a)(2)(ii)		50.36(c)(1)(ii)(A)		50.73(a)(2)(iv)(A)		50.73(a)(2)(x)
		20-2203(a)(2)(iii)		50.36(c)(2)		50.73(a)(2)(v)(A)		73.71(a)(4)
20%		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)	X	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

12. LICENSEE CONTACT FOR THIS LER

FACILITY NAME	TELEPHONE NUMBER (Include Area Code)
Edwin I. Hatch / Kathy A. Underwood, Performance Analysis Supervisor	(912) 537-5931

13. COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO EPIX		CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO EPIX

14. SUPPLEMENTAL REPORT EXPECTED			15. EXPECTED SUBMISSION DATE	MONTH	DAY	YEAR
YES (If yes, complete 15. EXPECTED SUBMISSION DATE)	X	NO				

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

On 10/03/2004 at 0530 ET, Unit 2 was in the Run Mode at an approximate power level of 561 CMWT (20 percent rated thermal power). At that time, Primary Containment was declared inoperable upon realizing that both manually operated Primary Containment Isolation Valves (PCIVs) 2P51-F651 and 2P51-F513 were open for penetration 21. Technical Specification 3.6.1.3 Condition B was entered because both manually operated PCIVs for one penetration were open in Mode 1. Required Action Statement (RAS) 2-04-197 was initiated at 0530 on 10/03/2004 which required closing at least one PCIV within 1 hour. With Maintenance support, the shift was able to close PCIV 2P51-F513 at 0655 on 10/03/2004.

RAS 2-04-197 continues to remain active because 2P51-F651 located inside the drywell is open. Valve 2P51-F513 is confirmed closed once every 31 days. Clearance process controls were inadequately addressed by the procedures associated with startup and drywell closeout. The procedures for startup and drywell closeout will be revised to strengthen the controls established for the clearance process. Procedure 34GO-OPS-003-2, "START-UP SYSTEM STATUS CHECKLIST" and procedure 34GO-OPS-028-2, "DRYWELL CLOSEOUT" will be revised to ensure that the tagouts related to the clearance process database are checked prior to startup.

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

PLANT AND SYSTEM IDENTIFICATION

General Electric - Boiling Water Reactor
Energy Industry Identification System codes appear in the text as (EIIS Code XX).

DESCRIPTION OF EVENT

Unit 2 was shutdown on 09/25/2004 at 0106 ET for Safety Relief Valve (SRV) replacement due to seat leakage on SRV 2B21-F013L. The outage was scheduled to last 66 hours. Unit 2 entered cold shutdown at 1100 on 09/25/2004. Primary containment (EIIS Code JM) was originally declared inoperable at 1143 on 09/25/2004 because the drywell door interlocks were defeated. The primary containment was scheduled to be open for approximately 26 hours. During this outage, the limit switches for Main Steam Isolation Valve (MSIV) (EIIS Code SB) 2B21-F022D were adjusted. In order to perform this task, the MSIV was stroked open and closed per 52SV-B21-001-2. During valve stroking, the MSIV became bound due to internal galling. As a result of this MSIV damage, the Unit 2 maintenance outage was extended for 5 ½ days.

Following the discovery of the damaged MSIV, Maintenance requested that Operations open the Service Air (SA) (EIIS Code LF) supply to drywell valves 2P51-F512, 2P51-F513, 2P51-F651 and 2P51-F589 in order to support the MSIV repairs. Valves 2P51-F651 and 2P51-F513 are PCIVs. The clearance process at the plant establishes requirements for several different types of tagouts. The clearance process includes danger tagouts, caution tagouts, and operating permit tagouts. In this instance the valves were opened with a caution tag (2-CA-04-2P51-00093). The caution tag was authorized at 0621 on 09/27/2004 and the caution tags were verified as hung at 1100 on 09/27/2004. This caution tag was not added to the primary containment RAS 2-04-180.

The Unit 2 Mode switch was placed in "STARTUP" at 1535 on 10/01/2004. The Unit 2 generator was tied to the line at 0400 on 10/03/2004. At 0530 on 10/03/2004 with the unit at approximately 20 percent rated thermal power, operations personnel questioned why caution tag 2-CA-04-2P51-00093 was still active. Primary Containment was declared inoperable upon realizing that both manually operated Primary Containment Isolation Valves (PCIVs) 2P51-F651 and 2P51-F513 were open for penetration 21. Technical Specification 3.6.1.3 Condition B was entered because both manually operated PCIVs for one penetration were open in Mode 1. Required Action Statement (RAS) 2-04-197 was initiated at 0530 on 10/03/2004 which required closing at least one PCIV within 1 hour. At 0630, Technical Specifications 3.6.1.3 Condition E was entered requiring the plant to be in Mode 3 within 12 hours. With Maintenance support, the shift was able to close PCIV 2P51-F513 at 0655 on 10/03/2004 isolating penetration 21 and no power reduction was required. RAS 2-04-197 remains active because PCIV 2P51-F651 located inside the drywell remains open. Valve 2P51-F513 is confirmed closed once every 31 days.

Primary Containment is required to be operable in Modes 1, 2 and 3. Primary containment was inoperable prior to the Mode switch being placed in "STARTUP" and remained inoperable until the manually operated

outboard PCIV 2P51-F513 was closed. Primary containment was inoperable when required (i.e., Modes 1, 2, and 3) for 39.33 hours.

Procedure 34GO-OPS-028-2, "DRYWELL CLOSEOUT," provides guidance and instructions for performing the final drywell inspection prior to closing the drywell. It should be noted that 34GO-OPS-028-2 requires checking some of the tagouts associated with the clearance process but did not require checking drywell caution tagouts.

Procedure 34GO-OPS-003-2, "START-UP SYSTEM STATUS CHECKLIST," provides instructions for confirming plant systems are in the correct status for a plant startup. The following steps are in the procedure's "Administrative" section:

- Review the danger tagouts and confirm no system and/or component required for startup is under a danger tagout.

- Confirm that all Unit 2 containment access barriers are closed per 34SV-SUV-011-2, Primary and Secondary Containment Integrity Demonstration.

The first step listed was deficient in that there was no requirement to review caution or Operating Permit tagouts. Not including the requirement to check caution tagouts was an oversight when the procedure was drafted. Operating Permit tagouts did not exist when the procedure was drafted.

The second step listed does not specifically state to perform 34SV-SUV-011-2. When the Shift Manager reached this step, the drywell had already been closed and the Drywell Airlock LLRT completed. The Shift Manager contacted the OCC to determine if 34SV-SUV-011-2 had been completed. Based on a log entry on 9/25/2004, the Operations representative in the OCC concluded the surveillance requirement was current. However, the service air valves had been opened after the procedure had been completed.

A broadness review as result of this event was performed which included reviewing all the tagouts associated with the clearance process for additional valves that might have been manipulated during the maintenance outage. No valves were identified that were manipulated by a tagout associated with the clearance process that were not restored. Plant procedures were reviewed to ensure all primary containment components were returned to their correct position. No valves or blind flanges were identified that might not be in the correct position. Procedure 34SV-SUV-011-2 was performed satisfactorily for the components outside the drywell.

The procedures for drywell close-out, start-up system checklist and plant startup were reviewed for both Unit 1 and Unit 2 to determine if additional requirements were needed. No other requirements were determined to be necessary other than the need to check the tagouts associated with the clearance process. The same requirements that are being added to the Unit 2 procedures will be added to the Unit 1 procedures.

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

CAUSE OF EVENT

The Unit Shift Supervisor failed to add caution tag number 2-CA-04-2P51-00093 to RAS 2-04-180. As a result, there was no tracking mechanism to alert the shift team that the caution tag had to be restored prior to terminating primary containment RAS 2-04-180.

The requirement to check all manual valves per 34GO-OPS-028-2 is inadequately stated and changes to the procedure are warranted to assure completion of this action.

The requirement to check all active clearance process tagouts per 34GO-OPS-003-2 is inadequately stated and changes to the procedure are warranted to assure completion of this action.

Neither 34GO-OPS-003-2 nor 34GO-OPS-028-2 required checking the caution tagouts prior to startup.

REPORTABILITY ANALYSIS AND SAFETY ASSESSMENT

This report is required by 10 CFR 50.73(a)(2)(i)(B) because the plant entered a condition that was prohibited by the plant's Technical Specifications. Specifically, primary containment is required to be operable prior to entering Mode 2. Contrary to this requirement the plant was placed in Mode 2 at 1535 on 10/01/2004 with primary containment inoperable. Technical Specifications Surveillance Requirements for TS LCO 3.6.1.3 require that (SR 3.6.1.3.2) each primary containment isolation manual valve and blind flange that is located outside primary containment and is required to be closed during accident conditions is closed; and that (SR 3.6.1.3.3) each primary containment isolation manual valve and blind flange that is located inside primary containment and is required to be closed during accident conditions is closed. Neither of these surveillance requirements was met when the Mode switch was placed in Mode 2. Additionally, this report is required by 10 CFR 50.73(a)(2)(v)(C) in that with primary containment inoperable there existed a condition that could have prevented the fulfillment of the safety function of structures or systems that are needed to control the release of radioactive material.

Primary Containment is required to be operable in Modes 1, 2 and 3. Primary containment was inoperable prior to the Mode switch being placed in "STARTUP" and remained inoperable until manually operated outboard PCIV 2P51-F513 was closed. Primary containment was inoperable when required (i.e., Modes 1, 2, and 3) for 39.33 hours. However, the likelihood of an event requiring PCIV isolation in this short time frame was low. Nonetheless, had an event occurred requiring isolation of the primary containment, all other PCIVs would have closed as designed. If an automatic reactor shutdown was required, the Reactor Protection System (RPS) (EIIS Code JE) was fully Operable, thus capable of placing and maintaining the plant in a safe shutdown condition. The plant service air piping in the drywell is seismic category I between the outboard and inboard PCIVs and is seismic category II downstream of the inboard PCIV. Furthermore, the Secondary Containment (reactor building) (EIIS Code NH) was fully Operable, as was the Standby Gas Treatment System (SBGT) (EIIS Code BH) during the 39.33 hour period that these PCIVs were open. Therefore, any release of radioactive materials into secondary containment would have been contained in the reactor

building and would have been controlled and filtered through the safety related SBGT system. For these reasons, it may be concluded that this event did not adversely impact nuclear safety or the health and safety of the public.

CORRECTIVE ACTIONS

The appropriate procedures will be revised as necessary to state the requirement to add clearance process tagouts to the appropriate RAS. This action will be completed by February 2005.

Procedures 34GO-OPS-003-1/2 will be revised to include the need to check all clearance process tagouts prior to startup. These revisions will be completed prior to the next drywell closeout or by February 2005, whichever is first.

Procedures 34GO-OPS-028-1/2 will be revised to: 1) Confirm all manual valves are in the correct position; 2) Clarify the requirement to address clearance process tagouts) 3) Add signoff steps. These revisions will be completed prior to the next drywell closeout or by February 2005, whichever is first.

ADDITIONAL INFORMATION

Other Systems Affected: No systems other than those already mentioned in this report were affected by this event.

Failed Components Information: No failed components directly caused or resulted from this event.

Commitment Information: This report does not create any permanent licensing commitments.

Previous Similar Events: There has not been any previous similar event in the past two years in which the unit started or operated with its primary containment inoperable.