



AUG 15 2005

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

**LER 311/05-004-00**  
**SALEM - UNIT 2**  
**FACILITY OPERATING LICENSE NO. DPR-75**  
**DOCKET NO. 50-311**

This Licensee Event Report, "Required post maintenance testing not performed on Containment Isolation Valves," is being submitted pursuant to the requirements of the Code of Federal Regulations 10CFR50.73(a)(2)(i)(B).

The attached LER contains no commitments.

Sincerely,

A handwritten signature in black ink that reads "Thomas P. Joyce".

Thomas P Joyce  
Site Vice President  
Salem Generating Station

Attachment(1)

IE22

# LICENSEE EVENT REPORT (LER)

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

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.

<b>1. FACILITY NAME</b> Salem Generating Station – Unit 2	<b>2. DOCKET NUMBER</b> 05000311	<b>3. PAGE</b> 1 OF 3
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**4. TITLE**  
Operation in a Condition Prohibited by Technical Specification – Containment Isolation Valves

5. EVENT DATE			6. LER NUMBER			7. REPORT DATE			8. OTHER FACILITIES INVOLVED	
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REV NO.	MONTH	DAY	YEAR	FACILITY NAME	DOCKET NUMBER
06	15	05	2005	04	00	08	15	2005	FACILITY NAME	DOCKET NUMBER

<b>9. OPERATING MODE</b>  1	<b>11. THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR§:</b> (Check all that apply)									
<b>10. POWER LEVEL</b>  100	<input type="checkbox"/> 20.2201(b)	<input type="checkbox"/> 20.2203(a)(3)(i)	<input type="checkbox"/> 50.73(a)(2)(i)(C)	<input type="checkbox"/> 50.73(a)(2)(vii)						
	<input type="checkbox"/> 20.2201(d)	<input type="checkbox"/> 20.2203(a)(3)(ii)	<input type="checkbox"/> 50.73(a)(2)(ii)(A)	<input type="checkbox"/> 50.73(a)(2)(viii)(A)						
	<input type="checkbox"/> 20.2203(a)(1)	<input type="checkbox"/> 20.2203(a)(4)	<input type="checkbox"/> 50.73(a)(2)(ii)(B)	<input type="checkbox"/> 50.73(a)(2)(viii)(B)						
	<input type="checkbox"/> 20.2203(a)(2)(i)	<input type="checkbox"/> 50.36(c)(1)(i)(A)	<input type="checkbox"/> 50.73(a)(2)(iii)	<input type="checkbox"/> 50.73(a)(2)(ix)(A)						
	<input type="checkbox"/> 20.2203(a)(2)(ii)	<input type="checkbox"/> 50.36(c)(1)(ii)(A)	<input type="checkbox"/> 50.73(a)(2)(iv)(A)	<input type="checkbox"/> 50.73(a)(2)(x)						
	<input type="checkbox"/> 20.2203(a)(2)(iii)	<input type="checkbox"/> 50.36(c)(2)	<input type="checkbox"/> 50.73(a)(2)(v)(A)	<input type="checkbox"/> 73.71(a)(4)						
<input type="checkbox"/> 20.2203(a)(2)(iv)	<input type="checkbox"/> 50.46(a)(3)(ii)	<input type="checkbox"/> 50.73(a)(2)(v)(B)	<input type="checkbox"/> 73.71(a)(5)							
<input type="checkbox"/> 20.2203(a)(2)(v)	<input type="checkbox"/> 50.73(a)(2)(i)(A)	<input type="checkbox"/> 50.73(a)(2)(v)(C)	<input type="checkbox"/> OTHER							
<input type="checkbox"/> 20.2203(a)(2)(vi)	<input checked="" type="checkbox"/> 50.73(a)(2)(i)(B)	<input type="checkbox"/> 50.73(a)(2)(v)(D)	Specify in Abstract below nr in NRC Form 366A							

**12. LICENSEE CONTACT FOR THIS LER**

<b>FACILITY NAME</b> Justin Wearne, Senior Licensing Engineer	<b>TELEPHONE NUMBER (Include Area Code)</b> 856-339-5081
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**13. COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT**

CAUSE	SYSTEM	COMPONENT	MANU-FACTURER	REPORTABLE TO EPIX	CAUSE	SYSTEM	COMPONENT	MANU-FACTURER	REPORTABLE TO EPIX
A	KN	ISV	-	No					

<b>14. SUPPLEMENTAL REPORT EXPECTED</b> <input type="checkbox"/> YES (If yes, complete 15. EXPECTED SUBMISSION DATE) <input checked="" type="checkbox"/> NO	<b>15. EXPECTED SUBMISSION DATE</b> MONTH:      DAY:      YEAR:
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**ABSTRACT (Limit to 1400 spaces, i.e., approximately 15 single-spaced typewritten lines)**

On June 15 and June 17, 2005 Salem Generating Station identified two containment isolation valves (CIVs) that did not have the required post maintenance testing performed following corrective maintenance. This was discovered during an extent of condition investigation for a related issue regarding post-maintenance testing of valves. Because of their particular system location and configuration these valves could not be retested in their as-found condition. The valves were declared inoperable and the appropriate Technical Specification actions were taken.

The apparent cause of this event was the failure of the Maintenance Planning organization to incorporate a leak rate testing (LLRT) activity into the work order after the scope of the order had become defined. A contributing cause of this event was these activities were handled as WIN (Work IT Now) activities.

Planned corrective actions are to perform the LLRT in the fall 2006 refueling outage. In the interim the flow path is isolated per TS 3.6.3 action statements. The procedure used by planners has been revised to include an activity for the in-service testing group (IST) to assist with determining work instructions and post maintenance testing requirements. The procedure used by the WIN team and the procedure used by the planning department will be combined.

This report is being made in accordance with 10CFR50.73(a)(2)(i)(B), "Any operation or condition which was prohibited by the plant's Technical Specifications..."

LICENSEE EVENT REPORT (LER)

1. FACILITY NAME	2. DOCKET	6. LER NUMBER			3. PAGE
Salem Generating Station – Unit 2	05000311	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	2 OF 3
		2005	- 04 -	00	

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

**PLANT AND SYSTEM IDENTIFICATION**

Westinghouse - Pressurized Water Reactor  
Reactor Coolant Sampling System {KN/ISV}\*

\* Energy Industry Identification System (EIS) codes and component function identifier codes appear in the text as {SS/CCC}.

**IDENTIFICATION OF OCCURRENCE**

Event Date: May 24, 2004  
Discovery Date: June 15, 2005

**CONDITIONS PRIOR TO OCCURRENCE**

Salem Unit 2 was in Mode 1 (OPERATIONS) at 100% power at the time of the event. No structures, systems or components were inoperable at the time of the occurrence that contributed to the event.

**DESCRIPTION OF OCCURRENCE**

On June 15 and June 17, 2005 during an extent of condition investigation for an issue regarding post-maintenance testing of valves, it was identified that two containment isolation valves (CIV's) had not received the required post maintenance local leak rate test (LLRT) following corrective maintenance.

On May 22, 2004 a boron buildup on the packing gland of the post-LOCA reactor coolant system (RCS) inside sample Containment Isolation valve 21SS182 from the 21 Hot Leg {KN/ISV} was identified. On May 24, 2004 a work order was issued to clean and tighten the packing gland.

On August 11, 2004 boron buildup on the packing gland of the Pressurizer liquid sampling outside containment isolation valve 2SS49 was identified. On November 18, 2004 a work order was issued to clean and tighten the packing gland.

At 1732 hours on June 15, 2005, the operating shift was notified that no as-left LLRT was performed after maintenance on 2SS49 in November 2004. The valve was declared inoperable and Technical Specification Action Statement (TSAS) 3.6.3, ACTION a, was entered to restore the valve within 4 hours or isolate. At 1819 hours the 2SS49 valve was mechanically isolated to comply with TSAS 3.6.3, ACTION c. On June 17, 2005, at approximately 1330 hours the operating shift was notified that no as-left LLRT was performed after maintenance on valve 21SS182 in May 2004. The valve, which was already isolated, was declared inoperable to comply with TSAS 3.6.3, ACTION c.

The configuration of these CIVs is such that they cannot be tested at power to confirm that the as-left valve LLRT is acceptable. Therefore, this event is being reported in accordance with 10CFR50.73(a)(2)(i)(B), "Any operation or condition which was prohibited by the plant's Technical Specifications..."

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

**PREVIOUS OCCURRENCES**

Salem Generating Station LERs for years 2002 through 2005 were reviewed for similar occurrences of lack of proper post-maintenance testing causing inoperability of a component. None were identified.

**CAUSE OF OCCURRENCE**

Neither of these corrective maintenance activities went through the normal planning process. They were handled as WIN activities. The WIN organization is chartered with performing simple and routine maintenance activities. Since these activities were planned as WIN maintenance, the level of detail in the planning was not sufficient to ensure the proper post maintenance testing was performed. Contributing to this was a lack of detailed written direction and poor communication between the planners, operations and IST.

**SAFETY CONSEQUENCES AND IMPLICATIONS**

There were no actual safety consequences associated with this event. In the case of the two valves that have not been adequately retested following corrective maintenance, there was an OPERABLE containment isolation valve in series with the inoperable containment isolation valve. Additionally, once the inoperable containment isolation valve was discovered (on June 15 and 17, 2005), actions were taken to isolate the process line IAW Technical Specification Action Statement 3.6.3. These actions remove the potential release path via the inoperable CIV.

This event does not constitute a Safety System Functional Failure (SSFF) as defined in Nuclear Energy Institute (NEI) 99-02, Regulatory Assessment Performance Indicator Guideline.

**CORRECTIVE ACTIONS**

1. Containment Isolation valves 2SS49 and 21SS182 were isolated per TS.
2. Leakrate tests of CIVs 2SS49 and 21SS182 are scheduled for the fall 2006 refueling outage.
3. Planning Departments Desk Guide has been revised to ensure activities that involve CIV's receive a review by the IST group for planning and testing purposes.
4. The WIN team desk guide will be incorporated into the Planning Departments Desk Guide to ensure that work orders are planned to the same standards.

**COMMITMENTS**

This LER contains no commitments.