

ACCESSION #: 9803120435

NON-PUBLIC?: N

LICENSEE EVENT REPORT (LER)

FACILITY NAME: Beaver Valley Power Station Unit 1 PAGE: 1 OF 3

DOCKET NUMBER: 05000334

TITLE: Failure to Perform Required Ventilation Filter Bank

Testing as Required by Technical Specifications

EVENT DATE: 01/23/98 LER #: 98-009-00 REPORT DATE: 03/06/98

OTHER FACILITIES INVOLVED: BVPS UNIT 2 DOCKET NO: 05000412

OPERATING MODE: 1 POWER LEVEL: 029

THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR SECTION:

50.73(a)(2)(i)

LICENSEE CONTACT FOR THIS LER:

NAME: R. D. Hart, Senior Licensing TELEPHONE: (412) 393-5284

Supervisor

COMPONENT FAILURE DESCRIPTION:

CAUSE: SYSTEM: COMPONENT: MANUFACTURER:

REPORTABLE NPRDS:

SUPPLEMENTAL REPORT EXPECTED: NO

ABSTRACT:

On January 23, 1998 at 1500 hours, with Unit 1 in Mode 1 at 29 % power and Unit 2 in Mode 5, an ongoing Technical Specification (TS) Surveillance Review identified a concern that the Units 1 and 2 Control Room Emergency Habitability Systems and Supplementary Leak Collection and Release Systems (SLCRS) ventilation filter banks may not have been tested in accordance with the Surveillance Requirements of their

respective unit TS. Each of these TS have as Surveillance Requirements demonstrating operability that after each complete or partial replacement of a HEPA or charcoal adsorber bank, the following be performed: 1. Verify that the charcoal adsorbers remove $\geq 99.xx$ % of a halogenated hydrocarbon refrigerant test gas when they are tested in-place in accordance with the applicable ANSI standard; 2. Verify that the HEPA filter banks remove $\geq 99.xx$ % of the DOP when they are tested in-place in accordance with the applicable ANSI standard. (xx represents a specific number for each system train). Contrary to this, a Technical Specification Interpretation was developed and issued in March, 1994 which only requires HEPA testing after partial or complete HEPA replacement and only requires charcoal testing after partial or complete charcoal replacement. This interpretation was then incorporated into surveillance tests performed to demonstrate filter bank operability following either HEPA or charcoal replacement. This interpretation was reviewed and on February 19, 1998 it was determined to be incorrect and a reportable event. The last performance of the affected surveillance tests performed on both units completed testing on both HEPA and charcoal adsorber units, as required by the applicable TS for that system. Regularly scheduled surveillance testing, as well as testing following painting, fire or chemical release in any ventilation zone communicating with the respective system, continued to be performed in accordance with TS requirements.

The apparent cause of this event is a human performance lapse on the part of Safety & Licensing personnel involved in processing the subject TS Interpretation. Individuals were of the mindset that verbatim compliance with TSs was not required if other support information considered reliable and pertinent (in this case Standard TS, and System Engineer recommendation) were available to support the desired result.

As corrective actions, affected test procedures have been revised to ensure that future filter bank testing is performed in accordance with TS, and the TS Interpretation authorizing partial HEPA and charcoal testing has been deleted. A review of current TS Interpretations will also be performed to ensure that other conflicts with the TS do not exist.

Failure to test Units 1 and 2 Control Room Emergency Habitability Systems and SLCRS ventilation filter banks in accordance with a TS Surveillance Requirement represents an operation or condition prohibited by TS and is reportable pursuant to the requirements of 10 CFR 50.73(a)(2)(i).

The health and safety of the public were not affected.

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PLANT AND SYSTEM IDENTIFICATION

Westinghouse Pressurized Water Reactor (PWR)

Containment Leakage Control System {BD/FLT}*_/

Control Complex Environmental Control System {VI/FLT}*_/

*_/ Energy Industry Identification System (EIIS), system and component function identifier codes appear in the text as {S/CC}.

CONDITIONS PRIOR TO OCCURRENCE

Unit 1: Mode 1, 29 percent Reactor Power

Unit 2: Mode 5, 0 percent Reactor Power

There were no structures, components, or systems that were inoperable that contributed to the event.

IDENTIFICATION OF OCCURRENCE

Discovery Date: January 23, 1998

Event Date: This event has existed since March 1, 1994.

DESCRIPTION OF EVENT

On January 23, 1998 at 1500 hours, an ongoing Technical Specification (TS) Surveillance Review identified a concern that the Units 1 and 2 Control Room Emergency Habitability Systems {VI/FLT} and Supplementary Leak Collection and Release Systems (SLCRS) {BD/FLT} ventilation filter banks may not have been tested in accordance with the Surveillance Requirements of their respective unit TS. These requirements are: Unit 1 Control Room Emergency Habitability System 4.7.7; Unit 1 SLCRS 4.7.8.1; Unit 2 Control Room Emergency Habitability System 4.7.8.4; and Unit 2 SLCRS 4.7.8.1. Each of these TS have as Surveillance Requirements demonstrating system operability that, after each complete or partial

replacement of a HEPA or charcoal adsorber bank, the following be performed: 1. Verify that the charcoal adsorbers remove $\geq 99.xx$ % of a halogenated hydrocarbon refrigerant test gas when they are tested in-place in accordance with the applicable ANSI standard; 2. Verify that the HEPA filter banks remove $\geq 99.xx$ % of the DOP when they are tested in-place in accordance with the applicable ANSI standard. (xx represents a specific number for each system train). On January 25, 1994, the System Engineering department, in a letter to the Safety & Licensing Department, requested that they evaluate a "System Engineering interpretations of operability" to determine if they meet the requirements of TS 3/4/7/8 and FSAR Section 6.5.3.2. In response, the Safety & Licensing Department replied on March 1, 1994, stating that "We also concur with the determination that if a partial or total replacement of the carbon adsorber is completed, it is not required to conduct in-place leak tests on the HEPA filters. And the converse as well, HEPA replacement does not require in-place leak tests on the carbon adsorbers." This was then made into a Technical Specification Interpretation, and surveillance test procedures used to demonstrate filter bank operability following either HEPA or charcoal replacement were subsequently changed.

Upon discovery, Condition Report Number 980112 was initiated to document this event. Evaluation of this event was initiated, which necessitated a review of historical records and interviews with personnel involved in

the authoring of the TS Interpretation in 1994. On February 19, 1998, this event was determined to be reportable per the requirements of 10 CFR 50.73.

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The last performance of affected surveillance tests performed on both units performed testing on both HEPA and charcoal adsorber units, as required by the applicable TS for that system. Regularly scheduled surveillance testing, as well as testing following painting, fire or chemical release in any ventilation zone communicating with the respective system, continued to be performed in accordance with TS requirements.

CAUSE

The apparent cause of this event is a human performance lapse on the part of Safety & Licensing personnel involved in processing the subject TS Interpretation. Individuals were of the mindset that verbatim compliance with Tss was not required if other support information considered reliable and pertinent (in this case Standard TS, and System Engineer recommendation) were available to support the desired result.

REPORTABILITY

Failure to test Units 1 and 2 Control Room Emergency Habitability Systems and (SLCRS) ventilation filter banks in accordance with a TS Surveillance Requirement represents an operation or condition prohibited by Technical Specifications and is reportable pursuant to the requirements of 10 CFR

50.73 (a)(2)(i).

SAFETY CONSEQUENCES

Regularly scheduled surveillance testing, as well as testing following painting, fire or chemical release in any ventilation zone communicating with the respective system, continued to be performed in accordance with TS requirements. During this testing, no existing performance problems were found that would have been corrected earlier had full post-maintenance testing have been performed.

CORRECTIVE ACTIONS

1. Surveillance test procedures used to demonstrate filter bank operability following either HEPA or charcoal replacement have been revised to ensure that future filter bank testing is performed in accordance with TS. This was completed on January 30, 1998.
2. The TS Interpretation authorizing partial HEPA and charcoal testing for ventilation filter banks on Units 1 and 2 Control Room Emergency Habitability and SLCRS Systems has been deleted. This was completed on March 2, 1998.
3. A review of current TS Interpretations listed on the TS Interpretation Index will be performed to ensure that other conflicts with the TS do not exist. This will be completed by June 5, 1998.
4. This LER will be reviewed by Safety & Licensing Department personnel. This will be completed by April 24, 1998.

PREVIOUS SIMILAR EVENTS

A review of Licensee Event Reports for the past two years did not identify erroneous Technical Specification Interpretations that resulted in operations or conditions prohibited by TS.

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Nuclear Services

Nuclear Power Division

March 6, 1998

L-98-035

Beaver Valley Power Station, Unit No. 1

Docket No. 50-334 License No. DPR-66

LER 98-009-00

United States Nuclear Regulatory Commission

Document Control Desk

Washington, DC 20555

In accordance with Appendix A, Beaver Valley Technical

Specifications, the following Licensee Event Report is submitted:

LER 98-009-00, 10 CFR 50.73(a)(2)(i), "Failure to Perform Required

Ventilation Filter Bank Testing as Required by Technical

Specifications."

S. C. Jain

JEH/ds

Attachment DELIVERING

QUALITY

ENERGY

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