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January 19, 1999

Re: Indian Point Unit No. 2
Docket No. 50-247
LER 98-21-00

Document Control Desk
US Nuclear Regulatory Commission
Mail Station PI-137
Washington, DC 20555

The attached Licensee Event Report 98-21 is hereby submitted in accordance with the requirements of 10 CFR 50.73.

Very truly yours,

A. Alan Blind

Attachment

cc: Mr. Hubert J. Miller
Regional Administrator - Region I
US Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, PA 19406

Mr. Jefferey Harold, Project Manager
Project Directorate I-1
Division of Reactor Projects I/II
US Nuclear Regulatory Commission
Mail Stop 14B-2
Washington, DC 20555

Senior Resident Inspector
US Nuclear Regulatory Commission
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NRC FORM 366 (6-1998) U.S. NUCLEAR REGULATORY COMMISSION

APPROVED BY OMB NO. 3150-0104 EXPIRES 06/30/2001

Estimated burden per response to comply with this mandatory information collection request: 50 hrs. Reported lessons learned are incorporated into the licensing process and fed back to industry. Forward comments regarding burden estimate to the Records Management Branch (T-6 F33), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, and to the Paperwork Reduction Project (3150-0104), Office of Management and Budget, Washington, DC 20503. If 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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TITLE (4)

Failure to Declare Automatic Containment Isolation Valve Inoperable

EVENT DATE (5)			LER NUMBER (6)			REPORT DATE (7)			OTHER FACILITIES INVOLVED (8)	
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	MONTH	DAY	YEAR	FACILITY NAME	DOCKET NUMBER
12	18	98	98	-- 2 1 --	00	1	19	99		05000
									FACILITY NAME	DOCKET NUMBER
										05000

OPERATING MODE (9)	N
POWER LEVEL (10)	99

THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more) (11)

	20.2201(b)		20.2203(a)(2)(v)	X 50.73(a)(2)(i)	50.73(a)(2)(viii)
	20.2203(a)(1)		20.2203(a)(3)(i)	50.73(a)(2)(ii)	50.73(a)(2)(x)
	20.2203(a)(2)(i)		20.2203(a)(3)(ii)	50.73(a)(2)(iii)	73.71
	20.2203(a)(2)(ii)		20.2203(a)(4)	50.73(a)(2)(iv)	OTHER
	20.2203(a)(2)(iii)		50.36(c)(1)	50.73(a)(2)(v)	Specify in Abstract below or in NRC Form 366A
	20.2203(a)(2)(iv)		50.36(c)(2)	50.73(a)(2)(vii)	

LICENSEE CONTACT FOR THIS LER (12)

NAME	TELEPHONE NUMBER (Include Area Code)
Philip Griffith, Sr. Licensing Engineer	(914)734-5190

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

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

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

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

On December 19, 1998, with the unit operating at 99% power, surveillance test PT-Q13 "Inservice Valve Test " was performed. During the valve stroke timing of automatic containment isolation valve 956D "Pressurizer Liquid Space Sample," the valve met the ASME Section XI "Required Range" stroke time, but failed to meet the 10 second "Limiting Value" required by PT-Q13. At this time, valve 956D was neither recognized as inoperable or declared as such as required by PT-Q13. Based on a subsequent test review conducted on December 21, 1998 by the InserviceTest Engineer, valve 956D was declared inoperable and the actions required by Technical Specification 3.6.A.3 for an inoperable automatic isolation valves were verified.

On December 19, 1998, upon completion of the stroke test, valve 956D was placed in the closed position. The Technical Specification 3.6.A.1.b requires automatic containment isolation valves to be "either operable or in the closed position or isolated by a closed manual valve." The post-accident position defined for valve 956D in UFSAR Table 5.2-1 is "closed" and with valve 956D in the closed position the post accident isolation function was met at all times.

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

PLANT AND SYSTEM IDENTIFICATION:

Westinghouse 4-Loop Pressurized Water Reactor

IDENTIFICATION OF OCCURRENCE:

Failure to declare automatic Containment Isolation Valve inoperable

EVENT DATE:

December 19, 1998

REPORT DUE DATE:

January 19, 1999

REFERENCES:

Indian Point 2 Condition Reporting System (CRS)No. 199810898

PAST SIMILAR OCCURRENCES:

None

DESCRIPTION OF OCCURRENCE:

On December 19, 1998, with the unit operating at 99% power, surveillance test PT-Q13 "Inservice Valve Test " was performed. During the valve stroke timing of automatic containment isolation valve 956D "Pressurizer Liquid Space Sample," the valve met the American Society of Mechanical Engineers (ASME) Section XI "Required Range" stroke time, but failed to meet the 10 second "Limiting Value" required by PT-Q13, Inservice Valve Test. The actual stroke time for 956D was measured at 10.26 seconds, within the ASME Section XI "Required Range" for closure of greater than 4.5 but less than 13.5 seconds.

The Senior Reactor Operator (SRO) directs the performance of PT-Q13 one valve at a time. Each valve has a three page data sheet that includes valve number, precautions and limitations, procedure step list and operability criteria. The SRO directs the test performance of PT-Q13 section 3.0 which measures and records the actual stroke time. Section 3.0 does not contain operability criteria for the valve stroke time. The actual valve stroke time is then transposed to section 4.0 which contains the valve operability criteria.

Section 4.0 contains the following directions should the valve fail to meet its "Limiting Value" for stroke time:
"4.1 IF the valve fails to exhibit the required change of position OR exceeds the LIMITING VALUE, the valve shall be immediately declared inoperable AND an SOR shall be written. Retest is NOT allowed."

The "Limiting Value" is a stroke time requirement determined by Con Edison Engineering based on valve size, type and actuator type. The limiting value is used for the determination of Technical Specification (TS) operability. On December 21 1998 at 1535, the Senior Watch Supervisor (SWS) declared 956D inoperable as a result of the test review performed by the Inservice Test (IST) Engineer which determined the limiting value had been exceeded.

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

DESCRIPTION OF OCCURRENCE(Continued):

While valve 956D was not declared inoperable at the time of failure as required by PT-Q13, Inservice Valve Test, the Senior Reactor Operator (SRO) had 956D placed in the closed position based on operational requirements. As a result, 956D had met the TS 3.6.A.1.b requirement for being "either operable or in the closed position" and the UFSAR post-accident closed requirements were also met subsequent to the failure.

ANALYSIS OF OCCURRENCE:

Since the valve 956D was not declared inoperable until after the TS 3.6.A.3.a allowable time, this event is being reported under the requirements of 10 CFR 50.73(a)(2)(i) as a condition prohibited by Technical Specifications. As a result of the failure to declare valve 956D inoperable, the valve could have been placed in the open position by a different watch section in violation of the requirements in TS 3.6.A.1.b.

When the condition was discovered by the IST Engineer the SWS declared valve 956D inoperable and verified that the required actions of TS 3.6.A.3.a were performed.

ROOT CAUSE SUMMARY:

The root cause of this event has been determined to be self-checking and supervisory checking. The SRO must review the operability criteria as part of completing the test process for each valve, as the procedure for testing of valve 956D requires; "If this valve does not meet the Operability Criteria, DO NOT stroke test any other valve unless directed to do so." Upon this review, the SRO should have reported to the SWS that valve 956D exceeded it's limiting value and must be declared immediately inoperable.

Upon completion of the test, the SWS is required to perform an operability review as documented in PT-Q13 Attachment 2 section 4.0. The requirement was as follows:
"4.1 SWS has reviewed Operability Criteria for EACH data sheet listed 2.1."

The SWS signs for completion of this review. This review was completed by the SWS on 12/19/98.

The SRO and the SWS reviewed the test results; both reviewed only the ASME Section XI acceptance criteria. Interviews with the SRO and SWS indicated that watch personnel review only the ASME Section XI acceptance criteria based on human conditioning from the review of other PT-Q13's and their understanding that ASME Section XI's purpose was to detect valve degradation prior to failure. The watch crew indicated that having ASME Section XI acceptance criteria outside of the limiting value stroke time from PT-Q13 is infrequent. The ASME Section XI allowed a 35% slower closure time than the limiting value stroke time from PT-Q13 for valve 956D, the Pressurizer Liquid Space Sample Containment Isolation valve.

In addition, a contributing causal factor of poor procedure design may have impacted the outcome of this event. The SWS noted that of the 18 valves listed in the surveillance, 17 are bounded by the ASME Section XI required range, with the single exception being valve 956D, which is bounded by its limiting value. Having one of 18 valves with acceptance criteria for the ASME Section XI that is outside the Technical Specification required range resulted in a repetitive task related error.

LICENSEE EVENT REPORT (LER)

TEXT CONTINUATION

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

CORRECTIVE ACTIONS:

1. Operations management is scheduled to review by March 31, 1999, the expectations for self-checking, supervisory checking and procedure use with all Shift Managers.

2. PT-Q13, Inservice Valve Test is scheduled to be revised by March 31, 1999, to improve procedure usability with focus on the human-factors relation to the ASME Section XI acceptance criteria that exceeds required Technical Specification stroke time.