

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 8710060556 DOC. DATE: 87/09/28 NOTARIZED: NO DOCKET #
 FACIL: 50-331 Duane Arnold Energy Center, Iowa Electric Light & Pow 05000331
 AUTH. NAME: AXLINE, J. S. AUTHOR AFFILIATION: Iowa Electric Light & Power Co.
 HANNEN, R. L. Iowa Electric Light & Power Co.
 RECIP. NAME: RECIPIENT AFFILIATION

SUBJECT: LER 87-026-00: on 870903, limiting condition for operation not immediately recognized during isolation valve repair. Caused by personnel error. Personnel counseled & procedure revised. W/870928 ltr.

DISTRIBUTION CODE: IE22D COPIES RECEIVED: LTR 1 ENCL 1 SIZE: 4
 TITLE: 50.73 Licensee Event Report (LER), Incident Rpt, etc.

NOTES:

	RECIPIENT ID CODE/NAME	COPIES		RECIPIENT ID CODE/NAME	COPIES	
		LTR	ENCL		LTR	ENCL
	PD3-1 LA	1	1	PD3-1 PD	1	1
	CAPPUCCI, A	1	1			
INTERNAL:	ACRS MICHELSON	1	1	ACRS MOELLER	2	2
	AEOD/DOA	1	1	AEOD/DSP/NAS	1	1
	AEOD/DSP/ROAB	2	2	AEOD/DSP/TPAB	1	1
	DEDRO	1	1	NRR/DEST/ADS	1	0
	NRR/DEST/CEB	1	1	NRR/DEST/ELB	1	1
	NRR/DEST/ICSB	1	1	NRR/DEST/MEB	1	1
	NRR/DEST/MTB	1	1	NRR/DEST/PSB	1	1
	NRR/DEST/RSB	1	1	NRR/DEST/SGB	1	1
	NRR/DLPQ/HFB	1	1	NRR/DLPQ/QAB	1	1
	NRR/DOEA/EAB	1	1	NRR/DREP/RAB	1	1
	NRR/DREP/RPB	2	2	NRR/DRIS/SIB	1	1
	NRR/PMAS/ILRB	1	1	<u>REG FILE</u> 02	1	1
	RES DEPY GI	1	1	RES TELFORD, J	1	1
	RES/DE/EIB	1	1	RGN3 FILE 01	1	1
EXTERNAL:	EG&G GROH, M	5	5	H ST LOBBY WARD	1	1
	LPDR	1	1	NRC PDR	1	1
	NSIC HARRIS, J	1	1	NSIC MAYS, G	1	1

LICENSEE EVENT REPORT (LER)

FACILITY NAME (1) Duane Arnold Energy Center (DAEC)	DOCKET NUMBER (2) 0 5 0 0 0 3 3 1	PAGE (3) 1 OF 0 3
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TITLE (4)
Limiting Condition for Operation Not Immediately Recognized During Isolation Valve Repair

EVENT DATE (5)			LER NUMBER (8)			REPORT DATE (7)			OTHER FACILITIES INVOLVED (8)			
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	MONTH	DAY	YEAR	FACILITY NAMES			DOCKET NUMBER(S)
									None			0 5 0 0 0
0 9	0 3	8 7	8 7	0 2 6	0 0	0 9	2 8	8 7				0 5 0 0 0

OPERATING MODE (9) N	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more of the following) (11)									
POWER LEVEL (10) 0 9 9	20.402(b)	20.406(c)	50.73(a)(2)(iv)	73.71(b)						
	20.406(a)(1)(i)	50.38(c)(1)	50.73(a)(2)(v)	73.71(c)						
	20.406(a)(1)(ii)	50.38(c)(2)	50.73(a)(2)(vii)	<input checked="" type="checkbox"/> OTHER (Specify in Abstract below end in Text, NRC Form 366A)						
	20.406(a)(1)(iii)	50.73(a)(2)(i)	50.73(a)(2)(viii)(A)	FOR INFORMATION						
	20.406(a)(1)(iv)	50.73(a)(2)(ii)	50.73(a)(2)(viii)(B)							
20.406(a)(1)(v)	50.73(a)(2)(iii)	50.73(a)(2)(ix)								

LICENSEE CONTACT FOR THIS LER (12)		TELEPHONE NUMBER
NAME Jeff S. Axline, Technical Support Engineer		AREA CODE 3 1 1 9
		8 1 5 1 1 - 1 7 1 6 0 1 0

COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)										
CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS	

SUPPLEMENTAL REPORT EXPECTED (14)			EXPECTED SUBMISSION DATE (15)	MONTH	DAY	YEAR
<input type="checkbox"/> YES (If yes, complete EXPECTED SUBMISSION DATE)			<input checked="" type="checkbox"/> NO			

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

On September 3, 1987, at 0751 hours, the plant was operating at 99% of rated thermal power when the Reactor Water Cleanup (RWC) system was taken out of service to allow maintenance on the RWC outlet isolation valve (M02740). Due to a misinterpretation of the requirements for maintenance, the involved operator de-energized the isolation valve in the open position. This condition is allowed by DAEC Technical Specifications (3.7.D.3) provided a 24 hour Limiting Condition for Operation (LCO) is entered. At the time the valve was de-energized open the LCO was inadvertently not entered. At 1313 hours this situation was identified as a result of a panel check following an expected RWC isolation. Rather than entering an LCO at this time, the valve was manually closed allowing the requirements of Technical Specification 3.7.D.2 to be met. This event had no affect on the safe operation of the plant.

The root cause of this event is personnel error on the part of utility licensed operators who de-energized the valve in the open position without entering an LCO.

As corrective action, operations personnel were counseled, via DAEC Operations Department Instruction Procedure 00, Section 6.2, using this event as a specific example of the importance of complying with Technical Specifications when performing maintenance.

This event is being reported for information only.

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

FACILITY NAME (1) Duane Arnold Energy Center (DAEC)	DOCKET NUMBER (2) 0 5 0 0 0 3 3 1	LER NUMBER (8)			PAGE (3)		
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER			
		8 7	— 0 2 6	— 0 0	0 2	OF	0 3

TEXT (If more space is required, use additional NRC Form 366A's) (17)

I. DESCRIPTION OF EVENT:

On September 3, 1987, at 0751 hours, the plant was operating at 99% of rated thermal power when the Reactor Water Cleanup (RWCU) system (EIS System Code CE) was taken out of service to allow preventive maintenance to be performed on the RWCU outlet isolation valve (CE-ISV-2740). This valve is a motor operated isolation valve which isolates feedwater from the RWCU system on low reactor level, RWCU system leak detection signals, and Standby Liquid Control System activation. A tagout for the breaker which powers the valve had been prepared the day before. On the tagout it stated that the "valve should be de-energized in the closed position". When maintenance began, the electrician stationed at the valve requested that the valve be cycled to allow measurement of stem travel. Following this measurement the electrician requested that the control room measure valve cycle time using position indication lights located in the control room. After this measurement was made the valve was in the open position. The next step on the Maintenance Instruction Form (MIF) required that the valve be de-energized so the electrician requested that the control room tagout the valve at this time. Before tagging out the valve the operator told the electrician that it was in the open position and asked if this was the position he wanted it in. When the electrician answered yes, the operator interpreted this as meaning "yes, the valve must be de-energized open" rather than what the electrician actually meant "yes, we can do the work with the valve open". At this time the tagout was changed from "tag closed" to "tag open" and the valve was de-energized open. This condition is allowed by DAEC Technical Specifications (3.7.D.3) provided a 24 Limiting Condition for Operation (LCO) is entered. At the time the valve was de-energized open (approximately 0830 hours) the LCO was inadvertently not entered. At 1313 hours this situation was identified as a result of a panel check following an expected RWCU isolation. Rather than entering a LCO at this time the valve was manually closed allowing the requirements of Technical Specification 3.7.D.2 to be met.

Several conditions contributed to this event. Originally, the maintenance on MO2740 was intended to be worked while the plant was shut down so the Corrective Maintenance Action Request (CMAR) did not include special instructions to ensure compliance with Technical Specifications. During review of the CMAR it was decided that the work could be performed safely while the plant was on line as long as the valve was de-energized closed during work. Although it was decided to work the CMAR while the plant was on line, the CMAR was not changed to reflect this decision. The MIF that was written the day before work was to begin did not state that the valve was to be in the closed position when de-energized so the electrician did not request the valve to be de-energized closed.

II. CAUSE OF EVENT:

The root cause of this event is personnel error on the part of utility licensed operators who de-energized the valve in the open position without entering a LCO. This error was not contrary to an approved procedure.

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

FACILITY NAME (1) Duane Arnold Energy Center (DAEC)	DOCKET NUMBER (2) 0 5 0 0 0 3 3 1	LER NUMBER (B)			PAGE (3)		
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER			
		8 7	- 0 2 6	- 0 0	0 3	OF	0 3

TEXT (If more space is required, use additional NRC Form 366A's) (17)

III. ANALYSIS OF EVENT:

This event had no affect on the safe operation of the plant. The purpose of this valve is to isolate the outlet of the RWCU system from the feedwater piping in the event that there is a leak in the RWCU system or a low water level is detected in the vessel. Neither of these conditions occurred while the valve was de-energized open. If a leak would have developed in the RWCU system while the valve was open, there are two check valves in series with this isolation valve which would have prevented leakage from the vessel until the isolation valve could be manually closed.

IV. CORRECTIVE ACTION:

As corrective action, operations personnel were counseled, via DAEC Operations Department Instruction Procedure 00, Section 6.2, using this event as a specific example of the importance of complying with Technical Specifications when performing maintenance. As an additional corrective action, the CMAR procedure will be revised to prevent the performance of an outage priority CMAR while on line without a complete documented review of the CMAR and its associated attachments to account for on line conditions.

V. ADDITIONAL INFORMATION:

A search through previous LER's did not indicate an event of this type involving de-energization of a primary containment isolation valve without meeting the required Technical Specification had occurred at the DAEC prior to this event.

This event is being reported for information only.

Iowa Electric Light and Power Company

September 28, 1987

DAEC-87-0986

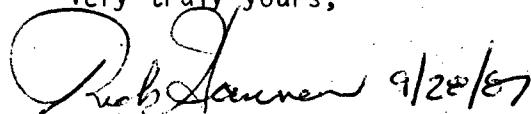
U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D. C. 20555

Subject: Duane Arnold Energy Center.
Docket No. 50-331
Op. License DPR-49
Licensee Event Report No. 87-026

Gentlemen:

In accordance with 10 CFR 50.73 please find attached a copy of the subject Licensee Event Report.

Very truly yours,



Rick L. Hannen
Plant Superintendent - Nuclear

RLH/BNT/go

Attachment - LER 87-026

cc: Mr. A. Bert Davis
Regional Administrator
Region III
U. S. Nuclear Regulatory Commission
799 Roosevelt Road
Glen Ellyn, IL 60137

NRC Resident Inspector - DAEC

File A-118a

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11