

# CATEGORY 1

## REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR:9811240173 DOC.DATE: 98/11/16 NOTARIZED: NO DOCKET #  
 FACIL:50-269 Oconee Nuclear Station, Unit 1, Duke Power Co. 05000269  
 AUTH.NAME AUTHOR AFFILIATION  
 BURCHFIELD,J. Duke Power Co.  
 MCCOLLUM,W.R. Duke Power Co.  
 RECIP.NAME RECIPIENT AFFILIATION

SUBJECT: LER 98-014-00:on 981015,discovered that hydraulic snubber had been inappropriately removed from TS visual surveillance procedure.Caused by inappropriate action.Procedure revised. With 981116 ltr.

DISTRIBUTION CODE: IE22T COPIES RECEIVED:LTR 1 ENCL 1 SIZE: 6  
 TITLE: 50.73/50.9 Licensee Event Report (LER), Incident Rpt, etc.

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W. R. McCollum, Jr.  
Vice President

November 16, 1998

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

Subject: Oconee Nuclear Station  
Docket No. 50-269  
Licensee Event Report 269/1998-14, Revision 00  
Problem Investigation Process No.: 5-098-4850

Gentlemen:

Pursuant to 10 CFR 50.73 Sections (a) (1) and (d), attached is Licensee Event Report 269/1998-14, concerning a missed snubber surveillance due to an inappropriate action.

This report is being submitted in accordance with 10 CFR 50.73 (a) (2) (i). This event is considered to be of no significance with respect to the health and safety of the public.

Very truly yours,



W. R. McCollum, Jr.

Attachment

9811240173 981116  
PDR ADOCK 05000269  
S PDR

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Document Control Desk  
Date: November 16, 1998  
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cc: Mr. Luis A. Reyes  
Administrator, Region II  
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Mr. M. A. Scott  
NRC Resident Inspector  
Oconee Nuclear Station

### LICENSEE EVENT REPORT (LER)

FACILITY NAME (1) **Oconee Nuclear Station, Unit One** DOCKET NUMBER (2) **05000 269** PAGE (3) **1 OF 6**

TITLE (4)  
**Hydraulic Snubber Deleted From Surveillance Procedure Due To Inappropriate Action**

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(S)
10	15	1998	1998	14	00	11	16	1998		05000
										05000

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) <b>100%</b>	<input type="checkbox"/> 20.402(b)	<input type="checkbox"/> 20.405(c)	<input type="checkbox"/> 50.73(a)(2)(iv)	<input type="checkbox"/> 73.71(b)
	<input type="checkbox"/> 20.405(a)(1)(i)	<input type="checkbox"/> 50.36(c)(1)	<input type="checkbox"/> 50.73(a)(2)(v)	<input type="checkbox"/> 73.71(c)
	<input type="checkbox"/> 20.405(a)(1)(ii)	<input type="checkbox"/> 50.36(c)(2)	<input type="checkbox"/> 50.73(a)(2)(vii)	<input type="checkbox"/> OTHER (Specify in Abstract below and in Text, NRC Form 366A)
	<input type="checkbox"/> 20.405(a)(1)(iii)	<input checked="" type="checkbox"/> 50.73(a)(2)(i)(B)	<input type="checkbox"/> 50.73(a)(2)(viii)(A)	
	<input type="checkbox"/> 20.405(a)(1)(iv)	<input type="checkbox"/> 50.73(a)(2)(ii)	<input type="checkbox"/> 50.73(a)(2)(viii)(B)	
	<input type="checkbox"/> 20.405(a)(1)(v)	<input type="checkbox"/> 50.73(a)(2)(iii)	<input type="checkbox"/> 50.73(a)(2)(x)	

LICENSEE CONTACT FOR THIS LER (12)

NAME **J.E. Burchfield, Regulatory Compliance Manager** TELEPHONE NUMBER **885-3292**  
AREA CODE **(864)**

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)  YES (f yes, complete EXPECTED SUBMISSION DATE)  NO

EXPECTED SUBMISSION DATE (15)

MONTH	DAY	YEAR

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

On October 15, 1998, with Unit 1 at 100% full power, Engineering was performing a review of design loads on hydraulic snubbers. They discovered that a hydraulic snubber had been inappropriately removed from the Technical Specification visual surveillance procedure. An investigation determined that the last time this snubber had been inspected was on June 16, 1996. The subject snubber had been removed from the procedure on January 7, 1998, during a major procedure revision. Documentation could not be found to support removal of the snubber from the procedure. The TS maximum interval was exceeded on May 1, 1998. The snubber was inspected with satisfactory results on October 15, 1998.

The root cause for this event is an inappropriate action. A contributing cause is a failure to adhere to policies and directives. Corrective actions include revising the procedure to include the snubber and counseling the personnel involved in this event.

The health and safety of the public were not compromised by this event.

**LICENSEE EVENT REPORT (LER)  
TEXT CONTINUATION**

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 50.0 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE INFORMATION AND RECORDS MANAGEMENT BRANCH (MNNB 7714), 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

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**EVALUATION:****BACKGROUND:**

The hydraulic snubber for Support/Restraint (S/R) 1-01A-0-403C-JH-1519 is located on the Unit 1 Main Steam [EIIS:SB] system piping in the Turbine Building. The S/R is attached to a 6 inch diameter pipe supplying MS to the Turbine Driven Emergency Feedwater Pump.

Technical Specification (TS) 4.18 requires that each snubber associated with the Reactor Coolant [EIIS:AB] System and other safety related systems be visually inspected on an 18 month frequency. The maximum allowed TS interval is 22 1/2 months.

Maintenance Procedure MP/1/A/3018/011 (Snubbers - Hydraulic - Unit 1 - Accessible Inspection) is one of the procedures utilized to meet TS 4.18.

TS 3.14 states, in part, that if a snubber is determined to be inoperable, continued operation is permitted for a period not to exceed 72 hours.

TS 3.4.3b states, in part, that one turbine driven emergency feedwater pump or one emergency feedwater [EIIS:BA] flow path may be inoperable for a period of up to 72 hours.

**DESCRIPTION OF EVENT:**

On October 15, 1998, Engineering was reviewing existing design loads on all hydraulic snubbers. Component Engineer-A (CE-A) discovered that snubber S/R 1-01A-0-403C-JH-1519 was not listed in the appropriate visual inspection procedure, MP/1/A/3018/011. After further review, CE-A discovered that the snubber had been inspected for its regularly scheduled Technical Specification (TS) surveillance on June 16, 1996, but had not been inspected during performance of MP/1/A/3018/011 in January 1998. The maximum interval was exceeded on May 1, 1998.

On October 15, 1998, the snubber was declared inoperable. Operations entered a TS 3.14 Limiting Condition for Operation (LCO) at 1400 hours and preparations were made to perform a visual inspection per the TS

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requirement. Also, as a conservative measure, the associated Emergency Feedwater train was declared inoperable and a LCO per TS 3.4.3b was entered. A work request was initiated to perform a visual inspection of the snubber. The snubber was visually inspected and found to be satisfactory.

On October 16, 1998, at 0010 hours, TS 3.14.2 and 3.4.3b LCOs were exited.

An investigation into this event was initiated. On November 13, 1990, procedure MP/1/A/3018/011 revision 21 was approved and issued with the snubber included. The last time the inspection was performed using revision 21 was June 16, 1996. Snubber S/R 1-01A-0-403C-JH-1519 was found to be satisfactory. On January 7, 1998, a major revision (revision 22) was approved and issued. Snubber S/R 1-01A-0-403C-JH-1519 was not included in this revision. On January 13, 1998, the procedure was performed for the first time utilizing revision 22. Since the snubber was not included in the procedure it was not inspected.

Personnel who prepared, reviewed, and approved procedure revision 22 were interviewed. CE-B stated that he is notified by Maintenance Craft personnel when they physically add or remove a snubber during implementation of a Nuclear Station Modification (NSM). He indicated that he typically used an informal telephone notification as justification for revising the inspection procedure. He did not typically reference the NSM number or require copies of NSM documents for verification. CE-B acknowledged that he provided a marked up copy of the existing procedure as a draft for a procedure change and that this snubber was marked for deletion. However, he did not have documentation to indicate why this snubber should have been deleted. Due to the elapsed time from January 1998, when the draft copy was marked, until October 1998, when the omission was discovered, CE-B can not recall any specific details related to this occurrence.

The individual who signed as Preparer received the marked up copy from CE-B, and included the indicated changes with other changes as part of a periodic procedure update. The procedure update also included conversion due to a change in word processing software. CE-B then reviewed the procedure revision as the independent Qualified Reviewer.

### LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

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FACILITY NAME (1)  Oconee Nuclear Station, Unit One	DOCKET NUMBER (2)  269	LER NUMBER (6)	PAGE (3)						
		<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 25%;">YEAR</th> <th style="width: 25%;">SEQUENTIAL NUMBER</th> <th style="width: 25%;">REVISION NUMBER</th> </tr> </thead> <tbody> <tr> <td style="text-align: center;">1998</td> <td style="text-align: center;">14</td> <td style="text-align: center;">00</td> </tr> </tbody> </table>	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	1998	14	00	4 OF 6
YEAR	SEQUENTIAL NUMBER	REVISION NUMBER							
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The procedure Preparer also drafted a description of the procedure change for the Procedure Major Change Process Record and the 10CFR50.59 forms for CE-B. This description erroneously did not indicate that snubbers were being added or deleted from the procedure. As a result, the Qualified Reviewer (Engineer-C) for the 10 CFR 50.59 did not address the issue.

#### CONCLUSION:

The root cause of this event is an inappropriate action. Component Engineer-B (CE-B) should have relied on modification process documentation to support removal of equipment from procedure revision 22.

A contributing cause is the failure to adhere to policies and directives. Nuclear Site Directive 703 (Administrative Instructions for Station Procedures) requires each procedure be reviewed by a Qualified Reviewer other than the procedure preparer. Even though a different person typed the procedure, the Qualified Reviewer performed the mark up of the revision and, thereby, contributed to its preparation. Also, the safety evaluation did not specify that any snubbers were deleted or added. If the deleted snubber had been identified in the safety evaluation, the independent reviewer might have detected the inappropriate snubber deletion.

An Operating Experience Data Base search was conducted for events that have occurred related to snubbers. LER 269/96-05, Technical Specification Surveillance Interval Exceeded Due to Deficient Work Practices occurred when the Accountable Engineer failed to enter a snubber in the TS surveillance maintenance procedure. Therefore, this event is considered recurring.

There were no equipment failures associated with this event.

No personnel injuries, radiation exposures, or releases of radioactive materials occurred with this event.

## LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

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### CORRECTIVE ACTION:

#### Immediate:

1. Technical Specifications 3.14 and 3.4.3b Limiting Condition for Operation were entered for Unit 1.
2. Maintenance Procedure MP/1/A/3018/011 was revised to include snubber S/R 1-01A-0-403C-JH-1519.
3. Snubber S/R 1-01A-0-403C-JH-1519 was visually inspected with acceptable results.

#### Subsequent:

1. A Root Cause Investigation process was initiated.
2. Component Engineer-B was counseled concerning the inappropriate action and Management expectations for adhering to policies and directives.

#### Planned:

1. Verify that Maintenance procedures utilized for complying with Technical Specification surveillance requirements include all applicable snubbers.
2. Review implementation of the Qualified Reviewer process for maintenance procedures and implement corrective actions, as appropriate, to ensure that independence is being maintained.
3. Review implementation of the modification process (including minor modifications) to ensure affected procedures are being identified. Revise the process, as appropriate, to ensure the affected procedures are being identified.

Planned corrective action 1, 2, and 3 are considered to be NRC Commitment Items. These are the only NRC Commitment items contained in this LER.



## LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

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### SAFETY ANALYSIS:

This event involved a missed Technical Specification (TS) surveillance on a hydraulic snubber attached to Main Steam supply to Emergency Feedwater Pump Turbine piping. The snubber was inspected in June 1996, during the regular scheduled TS surveillance. The snubber exceeded the latest allowable visual inspection by approximately five months. Upon discovery, the snubber was visually inspected per the maintenance procedure with acceptable results. Therefore, the snubber would have performed its intended function during a seismic event.

Therefore, the health and safety of the public was not affected by this event.

ENCLOSURE 1

SIGNATURE SHEET

PIP #

Prepared By: W. Wayne Nelson Date: 11-16-98

Revised By: \_\_\_\_\_ Date: \_\_\_\_\_

Reviewed By: Paul M. Egan Date: 11-16-98

RC Dunge Date: 11/16/98

Randall P. Wood Date: 11-16-98

\_\_\_\_\_ Date: \_\_\_\_\_

\_\_\_\_\_ Date: \_\_\_\_\_

\_\_\_\_\_ Date: \_\_\_\_\_

Approved By: J. E. Buelchall Date: 11-16-98  
Manager, RGC

Reviewed By: Mk. Nejer for TSP Date: 11-16-98  
Station Manager

ENCLOSURES:

1. Regulatory Compliance Signature Sheet
2. References
3. Corrective Action Schedule
4. Personnel Contacted
5. Cause Code Summary

Date: November 16, 1998

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bxc: C.M. Misenheimer/EC08I

B.L. Walsh/EC11C

C.A. Patton/PB02L

P.H. Cox/NSRB/EC05N

R.G. Hull/EC07A

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\*LOTUS NOTES Distribution