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 FACIL: 50-323 Diablo Canyon Nuclear Power Plant, Unit 2, Pacific Ga      05000323  
 AUTH. NAME      AUTHOR AFFILIATION  
 WILSON, S.D.      Pacific Gas & Electric Co.  
 SHIFFER, J.D.      Pacific Gas & Electric Co.  
 RECIP. NAME      RECIPIENT AFFILIATION

SUBJECT: LER 88-026-00: on 880807, missed surveillance on reactor vessel head vents due to personnel error.

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# LICENSEE EVENT REPORT (LER)

FACILITY NAME (1) **DIABLO CANYON UNIT 2** DOCKET NUMBER (2) **05000323** PAGE (3) **1** OF **5**

TITLE (4) **MISSED SURVEILLANCE ON THE REACTOR VESSEL HEAD VENTS DUE TO PERSONNEL ERROR**

EVENT DATE (6)			LER NUMBER (8)			REPORT DATE (7)			OTHER FACILITIES INVOLVED (5)			
MONTH	DAY	YEAR	YEAR	SEQUENCE NUMBER	INVESTIGATION NUMBER	MONTH	DAY	YEAR	FACILITY NAMES			DOCKET NUMBER
08	07	88	88	02	6	00	05	11				05000323
												05000323

OPERATING MODE (9) **4** THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR § (11)

POWER LEVEL (10) **000**

10 CFR **50.73 (a)(2)(i)(B)**

OTHER (Specify in Abstract below and in Text, NRC Form 305A)

LICENSEE CONTACT FOR THIS LER (12) **STEPHEN D. WILSON, REGULATORY COMPLIANCE ENGINEER**

TELEPHONE NUMBER (13) **805 595-7351**

COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (11):

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NRC	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NRC

SUPPLEMENTAL REPORT EXPECTED (14)

YES  NO

EXPECTED SUBMISSION DATE (15)

MONTH	DAY	YEAR

ABSTRACT (16)

On August 7, 1988, at 1848 PDT, Unit 2 entered Mode 4 (Hot Shutdown) without performance of a full stroke exercise test for the four reactor vessel head vent valves, 8078A-D, in Mode 5 (Cold Shutdown) as required by Technical Specification (TS) 4.0.5 and ASME Section XI. The unit had entered Mode 5 due to a steam generator manway cover leak.

TS 4.4.11 requires that valves 8078A-D be full stroke exercised at least once per 18 months during Cold Shutdown or refueling. The Diablo Canyon Inservice Testing Program (IST) requires that these valves be exercised at least once during each Cold Shutdown. On July 19, 1988, the engineering surveillance test coordinator and the operations surveillance test coordinator incorrectly concluded that TS 4.4.11 satisfied the Diablo Canyon IST Program requirements.

The root cause of this event was personnel error. Personnel reviewing the test requirements for the reactor vessel head vent valves concluded that TS 4.4.11 surveillance frequency requirements were the only testing frequency requirements for the valves.

Surveillance Test Procedure V-2T2 will be revised to test the valves on a Cold Shutdown frequency in accordance with ASME Section XI and TS 4.0.5. A letter will be issued to all department surveillance test coordinators to review the event.

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PDR ADOCK 05000323  
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TEXT (If more space is required, use additional NRC Form 366A's) (17)

I. Initial Conditions

The unit was in transition from Mode 5 (Cold Shutdown) to Mode 4 (Hot Shutdown).

II. Description of Event

A. Event:

On August 7, 1988, at 1848 PDT, Unit 2 entered Mode 4 (Hot Shutdown) without performance of a full stroke exercise test of the four reactor vessel head vent valves, 8078A-D (AB)(VTV), in Mode 5 (Cold Shutdown) as required by Technical Specification (TS) 4.0.5 and ASME Section XI. The unit had been forced to enter Mode 5 before the next scheduled refueling outage due to a steam generator manway cover leak.

TS 4.4.11 requires that each reactor vessel head vent path be demonstrated to be operable at least once per 18 months. TS 4.4.11.b specifies that each reactor vessel vent valve be cycled through at least one complete cycle of full travel from the control room during Cold Shutdown or refueling. TS 4.4.11.c requires that flow be verified through the reactor vessel head vent paths during venting performed at Cold Shutdown or refueling. Article IHW-3411 of ASME Section XI specifies that category B valves be exercised at least once every 3 months, except as provided by IHW-3412(a) which requires that valves which are impractical to full stroke exercise during operation be exercised during Cold Shutdowns. The Diablo Canyon Inservice Testing (IST) Program requires that a full stroke exercise test be performed on 8078A-D at least each Cold Shutdown but not more frequent than once per 92 days. Therefore, the IST Program which implements TS 4.0.5 requires a more frequent full stroke exercise of the reactor vessel head vent valves than does TS 4.4.11.

On July 19, 1988, the engineering surveillance test coordinator and the operations surveillance test coordinator incorrectly concluded that TS 4.4.11 testing every 18 months satisfied the Diablo Canyon IST Program. The Recurring Task Scheduler was changed to indicate that Surveillance Test Procedure (STP) V-2T2, "Exercising and Position Indicator Verification of Reactor Vessel Head Vent Valves," periodicity would be changed from 92 days to 550 days for Units 1 and 2.

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

B. Inoperable structures, components, or systems that contributed to the event:

None

C. Dates and approximate times for major occurrences:

1. July 19, 1988: Surveillance test coordinators changed the frequency of STP V-2T2 from 92 days to 550 days based on review of TS 4.4.11.
2. August 7, 1988, at 1848 PDT: Event Date-Unit 2 enters Mode 4 without completing STP V-2T2 contrary to the requirements of TS 4.0.5.
3. April 11, 1989: Discovery Date.

D. Other systems or secondary functions affected:

None

E. Method of discovery:

A plant system engineer questioned the absence of STP V-2T2 from the Unit 2 forced outage work list.

F. Operator actions:

None required.

G. Safety system responses:

None

III. Cause of Event

A. Immediate Cause:

Based on the belief that TS 4.4.11 surveillance frequency requirements for valve operability met ASME XI requirements, engineering and operations personnel concluded that STP V-2T2 did not have to be performed prior to the Mode 5 to Mode 4 transition during the July 1988 Unit 2 forced outage.





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

B. Root Cause:

The root cause of this event was personnel error. Engineering and operations personnel reviewing the test requirements for the reactor vessel head vent valves concluded that the surveillance frequency requirements of TS 4.4.11 met the IST Program requirements.

C. Contributing factor:

The frequency requirement as stated in STP V-2T2 lacked sufficient clarity to identify the more restrictive test frequency as required in TS 4.0.5 and contributed to the confusion among reviewers.

IV. Analysis of Event

The surveillance requirements of TS 4.4.11 for the reactor vessel head vent valves were current throughout Cycle 2 operation of Unit 2. However, TS 4.0.5 requires a full stroke exercise test of the head vent valves on a Cold Shutdown surveillance test frequency. The NRC Staff commented on the DCPD IST Program in Supplemental Safety Evaluation Report (SSER) 31, April 1985. Section 3.1.3 of Appendix A to SSER-31 identifies conditions in which valve testing during Cold Shutdown is considered acceptable. In this section the NRC Staff allows for conditions where completion of all valve testing identified for a Cold Shutdown frequency is not a prerequisite for return to power. This may allow for valves in the IST Program to not be tested during short forced outages. Because the Unit 2 forced outage of July 1988 did not meet the requirements of SSER-31 to exempt the reactor vessel head vents from Cold Shutdown testing, this event represents a missed surveillance in accordance with TS 4.0.5. However, because the surveillance requirements of TS 4.4.11 were met the reactor coolant system vents remained operable throughout Unit 2 Cycle 2 operation. The reactor head vent valves were subsequently tested during the Unit 2 second refueling outage in September 1988 and shown to be fully operable. Therefore, there were no safety implication or consequences that resulted from this event.

V. Corrective Actions

A. Immediate corrective actions:

The Recurring Task Scheduler frequency for STP V-2T2 was returned to 92 days.

B. Corrective actions to prevent recurrence:

1. STP V-2T2 has been revised to test the valves on a Cold Shutdown frequency in accordance with ASME Section XI and TS 4.0.5, and to clarify test frequency requirements.

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		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER		
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TEXT (If more space is required, use additional NRC Form 306A's) (17)

2. A letter will be issued to all department surveillance test coordinators to review the event.

VI. Additional Information

A. Failed Components:

None

B. Previous LERs on similar problems:

There has been a previous LER (1-87-029-00) regarding a missed surveillance due to misinterpretation of TS requirements. The corrective actions taken to prevent recurrence of that event involved the review of other equipment affected by the TS requirement and revision of the applicable surveillance procedure. Since that event involved a different TS surveillance requirement, the corrective actions taken for LER 1-87-029-00 would not have prevented this occurrence.

2701S/0069K



Pacific Gas and Electric Company

7700 14 Street  
San Francisco, CA 94103  
415 372 7000  
770 372 6557

James D. Shiffer  
Vice President  
Nuclear Power Services

May 11, 1989

PG&E Letter No. DCL-89-128

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

Re: Docket No. 50-323, OL-DPR-82  
Diablo Canyon Unit 2  
Licensee Event Report 2-88-026-00  
Missed Surveillance on the Reactor Vessel Head Vents Due to  
Personnel Error

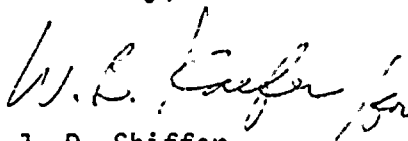
Gentlemen:

Pursuant to 10 CFR 50.73 (a)(2)(i)(B), PG&E is submitting the enclosed Licensee Event Report concerning the failure to perform a surveillance test on the reactor vessel head vent valves in accordance with Technical Specification 4.0.5.

This event in no way affected the public's health and safety.

Kindly acknowledge receipt of this material on the enclosed copy of this letter and return it in the enclosed addressed envelope.

Sincerely,



J. D. Shiffer

cc: J. B. Martin  
M. M. Mendonca  
P. P. Narbut  
H. Rood  
B. H. Vogler  
CPUC  
Diablo Distribution  
INPO

Enclosure

DC2-89-TN-N041

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