

PRIORITY

(ACCELERATED RIDS PROCESSING)

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR:9508020104 DOC.DATE: 95/07/27 NOTARIZED: NO DOCKET #
FACIL:50-388 Susquehanna Steam Electric Station, Unit 2, Pennsylva 05000388
AUTH.NAME AUTHOR AFFILIATION
KICHLINE,R.D. Pennsylvania Power & Light Co.
STANLEY,H.G. Pennsylvania Power & Light Co.
RECIP.NAME RECIPIENT AFFILIATION

SUBJECT: LER 95-009-00:on 950627,recognized that four HPCI sys
primary containment isolation valves did not meet
requirements of TS LCO 3.6.3a.2.Caused by inadequate
planning & scheduling.Entry into TS 3.0.2 made.W/950727 ltr.

DISTRIBUTION CODE: IE22T COPIES RECEIVED:LTR 1 ENCL 1 SIZE: 5
TITLE: 50.73/50.9 Licensee Event Report.(LER), Incident Rpt, etc.

NOTES:

	RECIPIENT ID CODE/NAME	COPIES LTTR ENCL	RECIPIENT ID CODE/NAME	COPIES LTTR ENCL
	PD1-2 PD	1 1	POSLUSNY,C	1 1
INTERNAL:	ACRS	1 1	AEOD/SPD/RAB	2 2
	AEOD/SPD/RRAB	1 1	FILE CENTER	1 1
	NRR/DE/ECGB	1 1	NRR/DE/EELB	1 1
	NRR/DE/EMEB	1 1	NRR/DISP/PIPB	1 1
	NRR/DOPS/OECB	1 1	NRR/DRCH/HHFB	1 1
	NRR/DRCH/HICB	1 1	NRR/DRCH/HOLB	1 1
	NRR/DSSA/SPLB	1 1	NRR/DSSA/SPSB/B	1 1
	NRR/DSSA/SRXB	1 1	RES/DSIR/EIB	1 1
	RGN1 FILE 01	1 1		
EXTERNAL:	L ST LOBBY WARD	1 1	LITCO BRYCE,J H	2 2
	NOAC MURPHY,G.A	1 1	NOAC POORE,W.	1 1
	NRC PDR	1 1	NUDOCS FULL TXT	1 1

NOTE TO ALL "RIDS" RECIPIENTS:

PLEASE HELP US TO REDUCE WASTE! CONTACT THE DOCUMENT CONTROL
DESK, ROOM OWFN 5D8 (415-2083) TO ELIMINATE YOUR NAME FROM
DISTRIBUTION LISTS FOR DOCUMENTS YOU DON'T NEED!

FULL TEXT CONVERSION REQUIRED
TOTAL NUMBER OF COPIES REQUIRED: LTR 27 ENCL 27



Pennsylvania Power & Light Company

Two North Ninth Street • Allentown, PA 18101-1179 • 215/774-5151

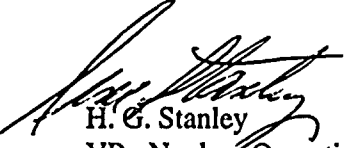
July 27, 1995

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

**SUSQUEHANNA STEAM ELECTRIC STATION
LICENSEE EVENT REPORT 388/95-009-00
PLAS- 642 FILE R41-2**

Docket No. 50-388
License No. NPF-22

Attached is Licensee Event Report 388/95-009-00. This report is being made pursuant to 10CFR50.73(a)(2)(i)(B), in that Susquehanna Unit 2 was in a condition prohibited by the plant's Technical Specifications as a result of entry into LCO ACTION 3.0.2 upon determination that five Unit 2 High Pressure Coolant Injection (HPCI) system primary containment isolation valves did not meet the requirements of the Technical Specification LCO 3.6.3a.2 action statement.


H. G. Stanley
VP - Nuclear Operations

RK/toc
Attachment

cc: Mr. T. T. Martin
Regional Administrator, Region I
U. S. Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, PA 19406

Ms. Maitri Banerjee
Sr. Resident Inspector
U. S. Nuclear Regulatory Commission
P. O. Box 35
Berwick, PA 18603-0035

9508020104 950727
PDR ADDCK 05000388
S PDR

IFED
11

LICENSEE EVENT REPORT (LER)

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 50.0 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE RECORDS AND REPORTS MANAGEMENT BRANCH (P-530), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

FACILITY NAME (1) Susquehanna Steam Electric Station - Unit 2	DOCKET NUMBER(2) 0 5 0 0 0 3 8 8 1	PAGE (3) OF 0 4
--	---------------------------------------	--------------------

TITLE (4)
Condition Prohibited by Technical Specification (Entry into 3.0.2)

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 NAMES		DOCKET NUMBER(S)															
0	6	2	7	9	5	9	5	—	0	0	9	—	0	0	0	7	2	7	9	5		0	5	0	0	0

OPERATING MODE (9) 1	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR 191.16 (Check one of more of the following) (11)										
POWER LEVEL (10) 1 0 0	20.402(b)			20.405(c)			50.73(a)(2)(v)			73.71(b)	
	20.405(a)(1)(i)			50.36(c)(1)			50.73(a)(2)(v)			73.71(c)	
	20.405(a)(1)(i)			50.36(c)(2)			50.73(a)(2)(vi)			OTHER (Specify in Abstract below and in Text, NRC Form 366A)	
	20.405(a)(1)(ii)			X 50.73(a)(2)(i)			50.73(a)(2)(vii)(A)				
	20.405(a)(1)(iv)			50.73(a)(2)(i)			50.73(1)(2)(vii)(B)				
20.405(a)(1)(v)			50.73(a)(2)(ii)			50.73(a)(2)(x)					

NAME Robert D. Kichline - Project Licensing Specialist							TELEPHONE NUMBER 7 1 7 5 4 2 - 3 2 8 9				
---	--	--	--	--	--	--	---	--	--	--	--

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

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 fifteen single-space typewritten lines) (16)

On June 27, 1995, with Unit 2 in Condition 1 at 100% power it was recognized that four High Pressure Coolant Injection (HPCI) System primary containment isolation valves did not meet the requirements of the Technical Specification LCO 3.6.3a.2 action statement following breaker maintenance in that the valve breakers were closed while in the LCO. Technical Specification LCO 3.0.2 was entered following identification that the requirements of Technical Specification LCO 3.6.3a.2 were not met. Additionally, on July 12, 1995, it was recognized that an additional HPCI primary containment isolation valve should have been in Technical Specification LCO 3.6.3a.2 on June 27, 1995. No entry into Technical Specification LCO 3.6.3a.2 or LCO 3.0.2 was made for this valve because the activities which required entry into Technical Specification LCO 3.6.3a.2 were completed. Following completion of electrical breaker maintenance, three of the valves remained closed or were only opened under administrative controls. One of the four valves was opened without administrative controls; however, it was in its normal plant line up and no breaches of the system down stream of the valve occurred. The failure to recognize valve breaker closure as an LCO related action was the result of inadequate planning, scheduling and administrative control of the breaker maintenance. Technical Specification LCO 3.6.3a.2 was not entered on the one valve because of a failure to recognize that a breach in the closed system requires the valves breaker to be open to maintain primary containment boundary integrity. There was no safety consequence as a result of the valves not meeting the requirements of Technical Specification LCO 3.6.3a.2 since four of the five valves identified remained closed during the maintenance activities, or were only opened under administrative controls. One valve was opened without administrative controls; however, this valve would have functioned as designed. Corrective actions to prevent recurrence include: training associated with Technical Specification LCO 3.6.3a.2, increasing the accountability for work planning and scheduling of work activities previously performed during non-operational conditions, and implementing a consistent approach for administrative controls of plant components.

NRC FORM 366a (6-89)		U.S. NUCLEAR REGULATORY COMMISSION		APPROVED OMB NO. 3159-0104 EXPIRES: 4/30/92					
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 RECORDS AND REPORTS MANAGEMENT BRANCH (P-530), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.							
FACILITY NAME (1)		DOCKET NUMBER (2)		LER NUMBER (6)				PAGE (3)	
Unit 2				YEAR	SEQUENTIAL NUMBER		REVISION NUMBER		
Susquehanna Steam Electric Station		0	5	0	0	0	3	8	8
		9	5	—	0	0	9	—	0
									2
									OF
									4

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

DESCRIPTION OF EVENT

On June 27, 1995, with Unit 2 in Condition 1 (Power Operation) at 100% power it was recognized that four High Pressure Coolant Injection (HPCI, EIIS Code: BJ) System primary containment isolation valves (HV255F002, HV255F003, HV255F012, and HV255F079) did not meet the requirements of the Technical Specification LCO 3.6.3a.2 action statement in that the valve breakers were closed while in the LCO. Technical Specification LCO 3.0.2 was entered following the identification that the requirements of Technical Specification LCO 3.6.3a.2 were not met.

Additionally, on July 12, 1995, it was recognized that HPCI primary containment isolation valve HV255F042 should have been in Technical Specification LCO 3.6.3a.2 on June 27, 1995. No entry into Technical Specification LCO 3.6.3a.2 or LCO 3.0.2 was made for this valve because the activities which required entry into Technical Specification LCO 3.6.3a.2 were completed, and the valve and closed system were restored to their normal configuration before July 12, 1995.

Primary containment isolation valve electrical breaker maintenance was scheduled to be performed as part of the Unit 2 HPCI maintenance activities. Technical Specification LCO 3.6.3a.2 was entered for valves F002, F003, F012 and F079 at the beginning of the maintenance work window. Following breaker maintenance the breakers were closed for breaker and valve testing. Because of the complexity and number of activities performed in this maintenance work window, the administrative controls/scheduling necessary for the work activities did not clearly identify compliance to the Technical Specification LCO 3.6.3a.2 action statement, which required the valves to be deactivated following completion of breaker maintenance. Therefore, when the valve breakers were closed, Technical Specification LCO 3.6.3a.2 was violated, which necessitated entry into Technical Specification 3.0.2.

During the planning and scheduling of the HPCI maintenance work it was not clearly understood that Technical Specification LCO 3.6.3a.2 required that a closed system be intact to maintain primary containment boundary integrity when the associated primary containment isolation valve is not deactivated. Consequently, when the work activities bounded by HPCI primary containment isolation valve F042 were being developed, the necessity to enter Technical Specification LCO 3.6.3a.2 was not considered. Since work activities bounded by this valve did not require deactivating the valve, no entry into Technical Specification LCO 3.6.3a.2 was considered necessary, even though draining of the primary containment boundary system associated with the valve was performed as part of the maintenance work window. Therefore, scheduling of entry into Technical Specification LCO 3.6.3a.2 for this valve was not made, nor was the LCO entered. The local leak rate test (LLRT) procedure also did not recognize this requirement.

NRC FORM 366a (6-89)		U.S. NUCLEAR REGULATORY COMMISSION		APPROVED OMB NO. 3159-0104 EXPIRES: 4/30/92					
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 RECORDS AND REPORTS MANAGEMENT BRANCH (P-530), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.							
FACILITY NAME (1) Unit 2		DOCKET NUMBER (2)		LER NUMBER (6)				PAGE (3)	
Susquehanna Steam Electric Station		0 5 0 0 0 3 8 8		YEAR 9 5	SEQUENTIAL NUMBER — 0 0 9	REVISION NUMBER — 0 0	3	OF	4

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

There was no safety consequence as a result of the valves not meeting the requirement of Technical Specification LCO 3.6.3a.2 action statement in that four of the five valves remained closed, or were only opened under administrative controls, during the HPCI maintenance work window. One valve (F079) was opened without administrative controls; however, this valve would have functioned as designed, was in its normal plant line up, and no breaches of the system occurred down stream of the F079 valve while it was opened. Additionally, the HPCI system was out of service during the maintenance work window and a safety assessment was performed to assure acceptability of the maintenance activities since the Unit was in Condition 1 (Power Operation).

CAUSE OF EVENT

The cause of the failure to meet Technical Specification LCO 3.6.3a.2 requirements for HPCI primary containment isolation valves F002, F003, F012 and F079, and F042 was inadequate planning and scheduling of the maintenance work window, and inadequate administrative control of the maintenance activities when being performed. Additionally, the failure to recognize that a breach of a primary containment boundary system with a primary containment isolation valve closed but not deactivated also required entry into Technical Specification LCO 3.6.3a.2 was a contributing factor associated with the F042 valve.

REPORTABILITY ANALYSIS

This event was determined to be reportable per 10CFR50.73(a)(2)(i)(B) as a condition prohibited by the plant's Technical Specifications, in that Technical Specification LCO 3.0.2 was entered on Unit 2 because the requirements of Technical Specification LCO 3.6.3a.2 action statement were not met for HPCI primary containment isolation valves F002, F003, F012 and F079, and entry into Technical Specification LCO 3.6.3a.2 was not made for HPCI primary containment isolation valve F042. A review of the Technical Specifications determined that LCO 3.0.2 was the appropriate action statement to be entered since this LCO requires entry when LCO action requirements are not met.

No entry into Technical Specification LCO 3.6.3a.2 or LCO 3.0.2 was made for HPCI primary containment isolation valve F042, since the activities which required entry into Technical Specification LCO 3.6.3a.2 had been completed and the valve had already been restored to operability, when the determination was made that Technical Specification LCO 3.6.3a.2 was applicable.

In accordance with guidance provided in NUREG 1022, Supplement 1, item 14.1, the required submission date for this report was determined to be July 27, 1995.

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 60.0 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE RECORDS AND REPORTS MANAGEMENT BRANCH (P-530), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

FACILITY NAME (1) Unit 2 Susquehanna Steam Electric Station	DOCKET NUMBER (2) 0 5 0 0 0 3 8 8	LER NUMBER (6)						PAGE (3)			
		YEAR	SEQUENTIAL NUMBER			REVISION NUMBER					
		9 5 —	0 0 9	—	0 0	4	OF	4			

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

CORRECTIVE ACTION

Upon determination that requirements of Technical Specification LCO 3.6.3a.2 were not met for HPCI primary containment isolation valves F002, F003, F012 and F079, entry into Technical Specification 3.0.2 was made. Although entry into Technical Specification LCO 3.6.3a.2 was not made for valve F042, the corrective actions identified below are applicable.

Corrective actions to preclude the event from recurring include: increasing the accountability for work planning and scheduling of work activities performed in Conditions 1, 2, or 3, that were previously performed in Conditions 4 or 5, and implementing a consistent approach for administrative controls of plant components. Specific actions include identification of LCO's necessary to perform work under the different unit operating conditions; improving the interface between the applicable functional organizations associated with this type of work activity during the planning and scheduling phase of work development.

Training on this event will be provided to Operations Shift Supervision, discussing the necessity of maintaining administrative control over work evolutions that are now performed under different unit operating conditions. Additionally, a briefing package for other station personnel associated with this type of work activity was developed and presented, stressing the necessity and accountability for proper planning, scheduling and execution of this type of work activity.

ADDITIONAL INFORMATION

Failed Component Identification: None

Previous Similar Events: There are no previous events on either Susquehanna units where Technical Specification LCO 3.0.2 was entered due to noncompliance with Technical Specification LCO 3.6.3a.2.