

**LICENSEE EVENT REPORT (LER)**

(See reverse for required number of digits/characters for each block)

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS MANDATORY INFORMATION COLLECTION REQUEST: 60.0 HRS. REPORTED LESSONS LEARNED ARE INCORPORATED INTO THE LICENSING PROCESS AND FED BACK TO INDUSTRY. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE INFORMATION AND 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.

FACILITY NAME (1)

Susquehanna Steam Electric Station - Unit 1

DOCKET NUMBER (2)

05000387

PAGE (3)

1 OF 3

TITLE (4)

Containment Boundary Not Tested In Accordance With The Technical Specifications

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
2	2	98	98	002	00	3	3	98	Susquehanna SES - Unit 2	05000388
									FACILITY NAME	DOCKET NUMBER
										05000

  

OPERATING MODE (9)	POWER LEVEL (10)	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more) (11)				
1	100	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

Cornelius T. Coddington - Senior Engineer, Licensing

TELEPHONE NUMBER (Include Area Code)

717 / 542-3294

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 (If yes, complete EXPECTED SUBMISSION DATE).

X NO

EXPECTED SUBMISSION DATE (15)

MONTH DAY YEAR

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

On February 2, 1998, at 2130 hours, with both Unit 1 and Unit 2 in Condition 1 (Power Operation) at 100% power, during a review of the Unit 2 Integrated Leak Rate Test (ILRT) valve lineup procedure, it was identified that 18 pressure instruments were not leak rate tested in accordance with Technical Specification 4.6.1.2. A review of similar instrumentation in Unit 1 identified that 15 instruments in that unit had not been tested in accordance with Technical Specification 4.6.1.2. This event was determined to be reportable per 10CFR50.73(a)(2)(i)(B). A request for enforcement discretion was requested from the NRC and granted verbally on 2/3/98. The cause of the event was determined to be that no configuration basis document exists related to containment boundary and containment boundary testing. In addition several causal factors were identified: 1) the Final Safety Analysis Report is not clear with respect to the configuration of these containment penetrations, 2) the design drawings do not clearly identify the containment boundary for these instrument penetrations, 3) proposed revisions to design drawings to show the containment boundary for these penetrations from a previous corrective action were canceled without initiating an alternative action, 4) reviews of revisions to the ILRT procedures failed to identify that the ILRT did not test the entire containment boundary, and 5) the change management and design control processes did not provide adequate controls. Corrective actions that have been taken include: testing of three of the Unit 2 instruments and revising the corrective action program procedure to preclude cancelling an action without initiating an alternative action. Corrective actions that will be taken include: testing of the remaining instruments in both units, reviewing and revising the ILRT procedures, and revising the Final Safety Analysis Report. There were no safety consequences or compromises to public health and safety since the calculated doses from a Loss of Coolant Accident assuming worst case leakage from the untested penetrations were less than the 10CFR50 and 10CFR100 limits.

**LICENSEE EVENT REPORT (LER)**  
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Susquehanna Steam Electric Station - Unit 1	05000				2 OF 3
	387	98	-- 002	-- 00	

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

**EVENT DESCRIPTION**

On February 2, 1998, at 2130 hours, with both Unit 1 and Unit 2 in Condition 1 (Power Operation) at 100% power, during a review of the Unit 2 Integrated Leak Rate Test (ILRT) valve lineup procedure, it was identified that 18 pressure instruments had not been leak rate tested in accordance with Technical Specification 4.6.1.2. These pressure instrument lines penetrate primary containment (EIS Code: NH) and are directly connected to the primary containment atmosphere. They are extensions of the primary containment, and therefore, are required to be leak rated tested during the ILRT. Similar pressure instruments in Unit 1 were reviewed to determine if they had been appropriately tested. It was determined that 15 instruments in Unit 1 had also not been tested in accordance with Technical Specification 4.6.1.2. Limiting Condition for Operation (LCO) 4.0.3 was entered on both units. A request for enforcement discretion from the requirements of Technical Specification Surveillance Requirement 4.6.1.2 was requested from the NRC and granted verbally on 2/3/98 and in writing on 2/5/98. Therefore, this event was determined to be a condition that is reportable per 10CFR50.73(a)(2)(i)(B).

**CAUSE OF EVENT**

The cause of the event was determined to be that no configuration basis document exists related to the containment boundary and containment boundary testing. In addition several causal factors were identified. These factors are: 1) the Final Safety Analysis Report is not clear with respect to the configuration of these instrument penetrations, 2) the design drawings do not clearly identify the containment boundary for these instrument penetrations, 3) proposed revisions to design drawings to show the containment boundary for these penetrations from a previous corrective action were canceled without initiating an alternative action, 4) reviews of revisions to the ILRT procedures failed to identify that the ILRT did not test the entire containment boundary, and 5) the change management and design control processes did not adequately control design documents or provide for leak rate testing of the containment boundary.

**REPORTABILITY/ANALYSIS**

During the revision process of the procedure that governs the valve lineup during the ILRT, a step by step review of the procedure against the design drawings was performed. On the design drawings, all instruments that connect to the containment atmosphere show that the valves and caps around them are the containment boundary. The valve lineup procedure and the ILRT procedure for Unit 2 required that 18 instruments that connect to the containment atmosphere be isolated and vented during the ILRT. Therefore, these instruments were not tested in accordance with Technical Specification 4.6.1.2. A review of the Unit 1 procedures revealed that 15 instruments similar to those in Unit 2 were required to be isolated and vented during the ILRT. Therefore, these instruments had also not been tested in accordance with the Technical Specification 4.6.1.2. This is reportable per 10CFR50.73(a)(2)(i)(B). The doses from a Loss of Coolant Accident were calculated assuming the worst case leakage for the untested instruments in each unit. The resulting calculated doses were less than the 10CFR50 and 10CFR100 limits. Therefore, there were no safety consequences or compromises to public health and safety.

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

In accordance with the guidelines provided in NUREG-1022, Revision 1, Section 5.1.1, the required submission date for this report was determined to be March 4, 1998.

**CORRECTIVE ACTIONS**

The following corrective actions have been taken:

- Enforcement Discretion for both Unit 1 and Unit 2 was requested by PP&L, Inc. and granted by the NRC verbally on 2/3/98 and in writing on 2/5/98.
- A change to the Unit 1 and Unit 2 Technical Specifications has been submitted to the NRC to reflect the enforcement discretion granted by the NRC.
- Three instrument penetrations in Unit 2, which provide indication only, have been satisfactorily leak rate tested.
- The procedure that governs the corrective action program has been revised to ensure that a required action cannot be closed without completing the action or first initiating an alternative action.
- The modification design inputs form was revised to list the Technical Specifications as an input for test requirements.

The following corrective actions are being taken:

- The design drawings and the ILRT procedures for both units will be reviewed to ensure that the containment boundary is properly tested.
- The ILRT procedures for both units will be revised to include testing these instruments.
- Procedures will be written to test the instruments and the instruments will be tested prior to the next scheduled ILRT and no later than the startup following the next refueling outage on each unit.
- The Final Safety Analysis Report will be revised to clearly identify the configuration basis for the containment boundary and containment boundary testing.

**ADDITIONAL INFORMATION**

Past Similar Events:           Docket No. 50-387      LER 95-014-00  
   Docket No. 50-388      LER 95-007-00

Failed Component:           None