



Commonwealth Edison
Dresden Nuclear Power Station
6500 North Dresden Road
Morris, Illinois 60450
Telephone 815/942-2920

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GFSLTR 94-0039

U.S. Nuclear Regulatory Commission
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Licensee Event Report 94-002, Docket 50-249 is being submitted as required by Technical Specification 6.6, NUREG 1022 and 10 CFR 50.73(a)(2)(ii).

Gary F. Spedl for 2-3-94

Gary F. Spedl
Station Manager
Dresden Station

GFS/cfq

Enclosure

cc: J. Martin, Regional Administrator, Region III
NRC Resident Inspector's Office
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TEXT Energy Industry Identification System (EIS) codes are identified in the text as [XX]

PLANT AND SYSTEM IDENTIFICATION:

General Electric-Boiling Water Reactor-2527 Mwt rated core thermal power.

Nuclear Tracking System (NTS) tracking code numbers are identified in the text as (XXX-XXX-XX-XXXXX)

EVENT IDENTIFICATION:

Process Line Primary Containment Isolation Valves Never Subjected to Type C Local Leak Rate Test due to Management Deficiency

A. CONDITIONS PRIOR TO EVENT:

Unit: 3 Event Date: 01/05/94 Event Time: 1750 hrs.
 Reactor Mode: N Mode Name: Run Power Level: 79%
 Reactor Coolant System (RCS) Pressure: 996 psig

B. DESCRIPTION OF EVENT:

At approximately 1750, on January 5, 1994 with Unit 3 operating at 79% power, as a result of a walkdown of primary containment penetration X-141, it was determined that a process line, which taps off an instrument line upstream of the excess flow check valve, had primary containment isolation valves which had never been given a proper 10 CFR 50, Appendix J Type C Local Leak Rate Test (LLRT). This walkdown on Unit 3 was the result of finding a similar problem on Unit 2.

The Shift Engineer was notified and a Problem Identification Form (PIF) was initiated per Dresden Administrative Procedure (DAP) 02-27, Integrated Reporting Process. An ENS phone notification was then made at 1931 Eastern Standard Time on Wednesday January 5, 1994 to report a condition that was outside the design basis of the plant. FSAR Section 6.2.6 states that Local Leak Rate Testing (LLRT) will be performed in accordance with 10 CFR 50, Appendix J. The process line, which was used to obtain Reactor Coolant Samples, had rarely been used since Unit 3 Start Up Testing. The sample line, which was added to Piping and Instrumentation Diagram as a result of a system walkdown in 1990, was determined to be an undocumented plant modification. Upon identification of the problem, the sample line primary containment isolation valves were taken Out-of-Service in the closed position per Technical Specification 3.7.D.2.

C. APPARENT CAUSE OF EVENT:

This report is being submitted in accordance with 10 CFR 50.73(a)(2)(ii) which requires the reporting of any condition that was outside the design basis of the plant.

The root cause of not performing an LLRT of the primary containment isolation valves on the sample line was due to a management deficiency of not having documented a plant design modification.

In addition, 10 CFR 50, Appendix J states:

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"Type C Tests" means tests intended to measure containment isolation valve leakage rates. The containment isolation valves included are those that:

1. Provide a direct connection between the inside and outside atmospheres of the primary reactor containment under normal operation, such as purge and ventilation, vacuum relief, and instrument valves. etc.

Safety Guide 11, now known as Reg. Guide 1.11, recommended that instrument lines have a self-actuated excess flow check valve installed to minimize containment leakage. Using the aforementioned references, an exemption from performing Type C tests on normally open manual isolation valves upstream of instrument line excess flow check valves was requested and subsequently granted by the NRC.

The incorrect interpretation that instrument lines are exempt from 10 CFR 50, Appendix J type C testing was a contributing factor that resulted in a walkdown of primary containment instrument penetrations being excluded from a containment overview performed in 1989.

D. SAFETY ANALYSIS OF EVENT:

The sample line, which is pressurized by 1000 psig reactor coolant, shows no evidence of leakage. The piping and valves, per the Master Equipment List, are ASME Section XI class 1 components as well as seismically qualified. Therefore, the safety significance is considered to be minimal.

E. CORRECTIVE ACTIONS:

The current modification process is controlled by Dresden Administrative Procedure (DAP) 05-01, Plant Modification Program. With this program in place, this type of documentation deficiency should not occur.

During Refuel Outage D3R13, which is scheduled to begin March 12, 1993, the sample valves will be given a Type C as-found LLRT. Under Work Request D23613, the sample line will be repaired, as required, and then the appropriate leakage testing performed. A supplement to this LER will be submitted upon completion of repairs and testing.

In order to ensure that no other similar conditions exist, every Unit 3 primary containment penetration will be walked down during Refuel Outage D3R13. (237-201-93-43201)

F. PREVIOUS OCCURRENCES:

<u>LER/Docket Numbers</u>	<u>Title</u>
92-016/0500237	Unchallenged Primary Containment Due to Management Deficiency

G. COMPONENT FAILURE DATA:

No Component Failure.