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February 7, 1994

GFSLTR 93-0049

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

Licensee Event Report 94-002, Docket 50-237 is being submitted as required by Technical Specification 6.6, NUREG 1022 and 10 CFR 50.73(a)(2)(ii).

2-8-94 Gary F/ Sped] Station Manager

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Dresden Station

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Enclosure

J. Martin, Regional Administrator, Region III cc: NRC Resident Inspector's Office File/NRC File/Numerical

153628

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

On January 9, 1994, at 1500 hours, an Engineering evaluation which was being performed to remove an unauthorized modification, determined that the piping supports associated with primary containment penetration X-146 did not meet design requirements stated in the UFSAR. The supports affected piping for Differential Pressure Transmitter dpt 2-1459-A, which senses Core Spray System Sparger integrity, as well as other instrumentation lines on the common supports. An operability determination was performed to assess the impact of the supports that did not meet design requirements. This evaluation found that the supports and attached piping would have remained intact during a seismic event. Therefore, the safety significance was minimal. Corrective actions will include upgrading the support configuration during the next refueling outage.

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TEXT Energy Industry Identification System (EIIS) 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:

Common Supports for PT 2-1459-A do not Meet FSAR Allowables Due to a Design Deficiency

A. <u>CONDITIONS PRIOR TO EVENT:</u>

Unit:	2	• .	Even	t Date:	01,	/09/94	4	Event	Time:	1500	hr
Reactor	Mode:	N .	Mode	Name:	Run		· · ·	Power	Level:	.98%	÷
Reactor	Coolant	: System	(RCS)	Pressu	re:	1000	psig	· .	-		

B. <u>DESCRIPTION OF EVENT:</u>

On January 9, 1994 at 1500 hours, an Engineering evaluation performed as part of design activities for design change P12-2-94-200 determined that the supports associated with instrumentation penetration X-146 did not meet plant design requirements as defined in the UFSAR. This design change was being performed to remove piping which had not been previously analyzed or tested. This event was previously reported in LER 94-001, Docket 50-237. An operability determination per Commonwealth Edison procedure, QE-ENC-40.1, was performed. In this operability determination, a re-analysis of piping was performed using increased seismic damping in accordance with Sargent and Lundy DC-SE-002, Seismic Design Criteria for Dresden Station. This evaluation determined that although the supports do not meet UFSAR requirements, the operability of supports and associated lines is maintained. All support, piping, and affected systems were considered operable in accordance with this operability determination.

APPARENT CAUSE OF EVENT:

This report is being submitted in accordance with 10CFR50.73(a)(2)(ii)(B), which requires the reporting of any event or condition that results in the plant being outside of the design bases. The subject lines and supports were installed utilizing original plant construction codes. An unauthorized modification was installed subsequent to the initial design and not documented on plant design drawings. The cause of this unauthorized modification was a management deficiency. Re-analysis of the configuration to current design standards, performed for the purpose of installing a plant design change, revealed an analysis deficiency and installation of inadequate supports.

D. <u>SAFETY ANALYSIS OF EVENT:</u>

The piping supports which did not meet UFSAR design requirements were associated with the Core Spray System Leak Line Break Detection instrumentation as well as other common lines associated with primary containment penetration X-146. An engineering evaluation has

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determined that, although the piping and supports do not meet the UFSAR design requirements, the integrity of the affected piping would have been maintained during a seismic event. Therefore, the safety significance of this event was minimal.

E. <u>CORRECTIVE ACTIONS:</u>

This event was associated with piping which was designed and installed during original plant construction and startup. An unauthorized plant modification which added an additional line was added but not documented on design drawings. The current modification process is controlled by Dresden Administrative Procedure (DAP) 05-01, Plant Modification Program. With this program in place, plant changes and design documentation would have prevented occurrence.

An operability evaluation performed by Site Engineering documented the operability of the as found configuration. Evaluation of additional changes to affected supports which will bring the supports into compliance with UFSAR design criteria is being performed by Site Engineering. This change is scheduled to be implemented at the next Unit 2 refuel outage. (NTS 237-180-94-00201)

A walkdown will be performed on Unit 3 to determine if a similar situation exists. Any necessary evaluations and/or changes will be generated as a result of this walkdown. This action is scheduled to be implemented at the next Unit 3 Refuel outage (NTS 237-180-94-00202).

F. **PREVIOUS OCCURRENCES:**

LER/Docket Number Title

93-008/0500249

Suppression Pool Temperature Monitoring Element Conduit Support Found Outside Design Criteria Allowables.

G. <u>COMPONENT FAILURE DATA:</u>

None