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Dresden Nuclear Power Station
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Telephone 815/942-2920

October 13, 1994

RLBLTR 94-0017

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

Licensee Event Report 94-002-01, Docket 50-249 is being submitted as required by Technical Specification 6.6, NUREG 1022 and 10CFR50.73(a)(2)(ii). This revised report provides an update on the corrective actions performed during the D3R13 refuel outage.

Sincerely,

Richard L. Bax
Unit 3 Station Manager
Dresden Station

RLB/MmG:cfq

Enclosure

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

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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 INFORMATION AND RECORDS MANAGEMENT BRANCH (MNBB 7714), 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) Dresden Nuclear Power Station, Unit 3	DOCKET NUMBER (2) 05000249	PAGE (3) 1 OF 3
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TITLE (4)
Process Line Primary Containment Isolation Valves Never Subjected to Type C Local

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
01	05	94	94	-- 002 --	01	02	04	94	None	
									FACILITY NAME	DOCKET NUMBER

OPERATING MODE (9) N	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more) (11)	<input type="checkbox"/> 20.2201(b)	<input type="checkbox"/> 20.2203(a)(3)(i)	<input type="checkbox"/> 50.73(a)(2)(iii)	<input type="checkbox"/> 73.71(b)
POWER LEVEL (10) 079		<input type="checkbox"/> 20.2203(a)(1)	<input type="checkbox"/> 20.2203(a)(3)(ii)	<input type="checkbox"/> 50.73(a)(2)(iv)	<input type="checkbox"/> 73.71(c)
		<input type="checkbox"/> 20.2203(a)(2)(i)	<input type="checkbox"/> 20.2203(a)(4)	<input type="checkbox"/> 50.73(a)(2)(v)	<input type="checkbox"/> OTHER
		<input type="checkbox"/> 20.2203(a)(2)(ii)	<input type="checkbox"/> 50.36(c)(1)	<input type="checkbox"/> 50.73(a)(2)(vii)	(Specify in Abstract below and in Text, NRC Form 366A)
		<input type="checkbox"/> 20.2203(a)(2)(iii)	<input type="checkbox"/> 50.36(c)(2)	<input type="checkbox"/> 50.73(a)(2)(viii)(A)	
		<input type="checkbox"/> 20.2203(a)(2)(iv)	<input type="checkbox"/> 50.73(a)(2)(i)	<input type="checkbox"/> 50.73(a)(2)(viii)(B)	
		<input type="checkbox"/> 20.2203(a)(2)(v)	<input checked="" type="checkbox"/> 50.73(a)(2)(ii)	<input type="checkbox"/> 50.73(a)(2)(x)	

LICENSEE CONTACT FOR THIS LER (12)

NAME M. McGivern, Local Leak Rate Test Coordinator Ext. 2526	TELEPHONE NUMBER (Include Area Code) (815) 942-2920
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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)				EXPECTED SUBMISSION DATE (15)			
<input type="checkbox"/> YES (If yes, complete EXPECTED SUBMISSION DATE).	<input checked="" type="checkbox"/> NO				MONTH	DAY	YEAR

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

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). 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 the Piping and Instrumentation Diagram as a result of a system walkdown in 1990, was determined to be an undocumented plant modification. 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. 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. As-found Type C leak testing was performed and the valves were not leaking. The process line has been subsequently removed with the welded end cap being subjected to a Hydro and an Appendix J Type A test.

**LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION**

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FACILITY NAME (1)		DOCKET NUMBER (2)		LER NUMBER (6)		PAGE (3)
Dresden Nuclear Power Station, Unit 3		05000249		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER
				94	-- 002 --	01
						2 OF 3

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

EVENT IDENTIFICATION:

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

A. PLANT 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 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. 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:

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

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Dresden Nuclear Power Station, Unit 3	05000249	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	3 OF 3
		94	-- 002 --	01	

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

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:

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. As-found Type C leak testing was performed during Refuel Outage D3R13 and the valves were not leaking. 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, the sample valves were given a Type C as-found LLRT and the valves were not leaking. Under Work Request D23613, the sample line was removed with the welded end cap being subjected to a Hydro and an Appendix J Type A test.

In order to ensure that no other similar conditions exist, every Unit 3 primary containment penetration was walked down during Refuel Outage D3R13 and no questionable penetrations were found. The Dresden Unit 2 walkdown will be completed during the next Unit 2 Refuel Outage. (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.