

Commonwealth Edison Company  
Dresden Generating Station  
6500 North Dresden Road  
Morris, IL 60450  
Tel 815-942-2920



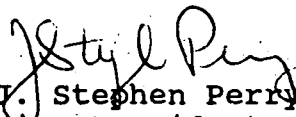
October 2, 1995

JSPLTR 95-0001

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

Licensee Event Report 95-020, Revision 0, Docket 50-237 is being submitted pursuant to 10CFR50.73(a)(2)(i), which requires the reporting of any operation or condition prohibited by the plant's Technical Specifications.

Sincerely,

  
J. Stephen Perry  
Vice President  
BWR Operations

JSP/MM:pt

Enclosure

cc: H. Miller, 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 (MNB 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 2 and 3

DOCKET NUMBER (2)  
05000237

PAGE (3)  
1 OF 4

TITLE (4)  
Primary Containment Boundaries Not Type B Tested Due to Management Deficiency

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
09	03	95	95	-- 020 --	00	10	03	95	Dresden Unit 3	05000249
									FACILITY NAME	DOCKET NUMBER

OPERATING MODE (9)	N	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more) (11)			
POWER LEVEL (10)	000	20.2201(b)	20.2203(a)(3)(i)	50.73(a)(2)(iii)	73.71(b)
		20.2203(a)(1)	20.2203(a)(3)(ii)	50.73(a)(2)(iv)	73.71(c)
		20.2203(a)(2)(i)	20.2203(a)(4)	50.73(a)(2)(v)	OTHER
		20.2203(a)(2)(ii)	50.36(c)(1)	50.73(a)(2)(vii)	(Specify in Abstract below and in Text, NRC Form 366A)
		20.2203(a)(2)(iii)	50.36(c)(2)	50.73(a)(2)(viii)(A)	
		20.2203(a)(2)(iv)	X 50.73(a)(2)(i)	50.73(a)(2)(viii)(B)	
	20.2203(a)(2)(v)	50.73(a)(2)(ii)	50.73(a)(2)(x)		

## LICENSEE CONTACT FOR THIS LER (12)

NAME	TELEPHONE NUMBER (Include Area Code)
M. McGivern, Local Leak Rate Test Coordinator Ext. 2526	(815) 942-2920

## 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)

At approximately 1400, on September 3, 1995, with Unit 2 shutdown for refuel and Unit 3 shutdown for maintenance, a verbatim compliance review of 10 CFR 50, Appendix J discovered that there were three Primary Containment boundaries on Unit 2 and four Primary Containment Boundaries on Unit 3 that had never been challenged with a Type B Local Leak Rate Test (LLRT). The unchallenged boundaries were valve packing of both normally open valves (backseat protects packing from system pressure) and normally closed test tap valves. The safety significance of never performing the Type B LLRT is considered minimal since a soap bubble check of the valve packing, when the system was pressurized, demonstrated no leakage. A formal review has been performed which provides justification for reverse testing and unchallenged potential primary containment leakage paths for both Unit 2 and Unit 3. One Unit 2 inboard Primary Containment Isolation Valve has packing which still needs to be Type B tested.

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

## EVENT IDENTIFICATION:

Primary Containment Boundaries Not Type B Tested Due to Management Deficiency

## A. PLANT CONDITIONS PRIOR TO EVENT:

Unit: 2(3)                      Event Date: 09/03/95                      Event Time: 1400  
Reactor Mode: N(N)              Mode Name: Refuel(Shutdown)      Power Level: 0%(0%)  
Reactor Coolant System Pressure: 0 psig(0 psig)

## B. DESCRIPTION OF EVENT:

As a result of 10 CFR 50, Appendix J, issues identified at Commonwealth Edison's Zion Nuclear Power Station, Dresden Plant Engineering performed a review of Dresden's Appendix J Program. This review included a Piping and Instrument Diagram (P&ID) and physical configuration check of each of the valves currently documented as being part of the Appendix J Program. This review was performed to determine if Primary Containment Isolation Valves (PCIVs) were Type C tested in the accident direction or the reverse direction, whether PCIV or maintenance valve packing was challenged during Type C testing, and whether all valve flanges were challenged during either Type B or Type C testing.

At approximately 1400 hours, on September 3, 1995, with Unit 2 shutdown for refuel and Unit 3 shutdown for maintenance, the verbatim compliance review of 10 CFR 50, Appendix J discovered that there were three Primary Containment boundaries on Unit 2 and four Primary Containment Boundaries on Unit 3 that had never been challenged with a Type B Local Leak Rate Test (LLRT). The unchallenged boundaries on Unit 2 included valve packing of normally open valves High-Pressure Coolant Injection [BJ] (HPCI) Steam Line Drain to Torus 2-2301-71, Reactor Building Closed Cooling Water [CC] (RBCCW) to Drywell 2-3799-128, and normally closed RBCCW to Drywell Vent valve 2-3799-132. The unchallenged boundaries on Unit 3 included valve packing of normally open valves HPCI Steam Line Drain to Torus 3-2301-71, RBCCW to Drywell 3-3799-126, and normally closed RBCCW to Drywell Vent valves 3-3799-138 and 3-3799-139. These valves' packings would not have even been challenged during a Type A Integrated Leak Rate Test (ILRT) since those systems are required to maintain the plant in a safe condition during the test and are operable in their normal mode (ie. water filled).

## C. CAUSE OF EVENT:

This LER is being submitted pursuant to 10 CFR 50.73(a)(2)(i)(B) which requires the reporting of any operation or condition prohibited by the plant's Technical Specifications.

Since Dresden Station Units 2 and 3 were designed and built before the General Design Criteria (GDC) were written, numerous systems have both PCIVs located outside of either the Drywell Liner or the Suppression Pool. Due to this configuration, Type C Local Leak Rate Testing (LLRT) of these PCIVs is normally done by pressurizing between the two valves. Thus, many of the inboard PCIVs are tested in the reverse direction (ie. not in the same direction as that when

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the valve would be required to perform its safety function). Also, during these Type C LLRTs, several Primary Containment boundaries such as flanges located between containment and the inboard PCIV, inboard PCIV valve packing, and valve packing of maintenance valves located between containment and the inboard PCIV are not challenged with air at accident pressure.

Dresden Station has historically interpreted Appendix J requirements to be satisfied for Primary Containment Boundaries that could not be challenged during a Type C LLRT, but could be challenged during a Type A LLRT. However, these requirements were not adequately incorporated into the Station's Appendix J documentation. The valve packings identified in this event could not be properly challenged during the ILRT because the packings were water-sealed at the time of the test. Dresden's documentation methods did not recognize this discrepancy.

A review of LLRT methodology was previously performed in 1989 at the Zion, Quad Cities, and Dresden sites with assistance from corporate engineering. This prior review identified certain volumes that were not being tested; actions were taken at that time to correct the identified deficiencies. However, the previous review did not identify the discrepancies described in this report. Therefore, the underlying root cause of this event is management deficiency in that the 1989 review process failed to identify/disposition the current discrepancies.

## D. SAFETY ANALYSIS:

The safety significance of never performing the Type B LLRT is considered minimal for Unit 3 since a soap bubble check of the valve packings when the system was pressurized demonstrated no leakage at accident pressure. The safety significance for Unit 2 is considered minimal for the three boundaries tested as no leakage was detected using the same testing technique as Unit 3. The 2-2301-71 valve is the only remaining valve to be tested. Since Unit 2 is shutdown, there is no threat to personnel or plant safety until the valve is tested. If the test results in a significant failure, a supplement will be submitted to update the safety analysis for this issue.

## E. CORRECTIVE ACTIONS:

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

A formal review has been performed by Dresden Station which provides justification for reverse testing and unchallenged potential primary containment leakage paths for both Unit 2 and Unit 3. The justification appears in a document entitled "Dresden Station Unit 3 LLRT Issues" dated September 4, 1995. Confidence in the current review is based on the process used to conduct the review. The Dresden Program Manager did a volume-by-volume screening of the Appendix J program. This screening process was independently reviewed by another qualified program manager. The results of this screening were documented in a list of issues which were then evaluated by an expert panel consisting of the Dresden Program Manager, the Dresden Engineering Testing Team Lead, and the LaSalle Station Program Manager. The Nuclear Engineering Appendix J expert was also involved in the screening. The results of this evaluation

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were presented to, reviewed and approved by the Plant Onsite Review Committee (PORC).

For those boundaries for which adequate justification regarding compliance with Appendix J could not be determined, the system was drained and the boundary challenged with air at accident pressure. The 2-2301-71 valve packing is the only remaining potential primary containment leakage path to be tested (237-180-95-02001), all Unit 3 valves have been tested. In addition, Dresden Technical Surveillance (DTS) 1600-01, Local Leak Rate Testing of Primary Containment Isolation Valves, will be revised to document the testing requirements of the boundaries identified in the program review to prevent missed surveillances on these boundaries in the future (237-180-95-02002).

## F. PREVIOUS OCCURRENCES:

<u>LER/Docket Numbers</u>	<u>Title</u>
94-001/0500237	Process Line Primary Containment Isolation Valves Never Subjected to Type C Local Leak Rate Test due to Management Deficiency
94-002/0500249	Process Line Primary Containment Isolation Valves Never Subjected to Type C Local Leak Rate Test due to Management Deficiency
92-016/0500237	Unchallenged Primary Containment Boundary due to Management Deficiency
90-018/0500237	Leakage Path Discovered During Primary Containment ILRT due to Management Deficiency

## G. COMPONENT FAILURE DATA:

There was no component failure.