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Dresden Generating Station
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February 7, 1997

JSPLTR #97-0024

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

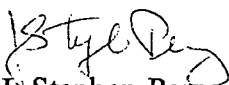
Enclosed is Licensee Event Report 97-001, Docket 50-237, which is being submitted pursuant to 10 CFR 50.73(a)(2)(i)(B) which requires the reporting of any operation or condition prohibited by the plant's Technical Specifications.

This correspondence contains the following commitments:

1. The Primary Containment penetrations not currently being tested will be reviewed to verify and document testing requirements are being met.
(NTS # 2371809700102)
2. The results of the root cause investigation and any significant corrective actions will be reported in a supplement to this LER. This supplement will address prior similar occurrences, the effectiveness of their corrective actions, and the significance of the timing of the changes to the modification process.
(NTS # 2371809700101)

If you have any questions, please contact Pete Holland, Dresden Regulatory Assurance Supervisor at (815) 942-2920 extension, 2714.

Sincerely,


J. Stephen Perry
Site Vice President
Dresden Station

Enclosure

cc: A. Bill Beach, Regional Administrator, Region III
NRC Resident Inspector's Office

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NRC FORM 366 (5-92)			U.S. NUCLEAR REGULATORY COMMISSION						APPROVED BY OMB NO. 3150-0104 EXPIRES 5/31/95								
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 2						DOCKET NUMBER (2) 05000237			PAGE (3) 1 of 4								
TITLE (4) Primary Containment Electrical Penetrations Never Subjected to Type B Local Leak Rate Test Due to Break Down of the Modification Process																	
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 Dresden Unit 3			DOCKET NUMBER 05000249					
01	09	97	97	-- 001 --	00	02	07	97	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)		100		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 D. Oakley, Local Leak Rate Engineer						Ext. 3708			TELEPHONE NUMBER (Include Area Code) (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)								EXPECTED SUBMISSION DATE (15)		MONTH	DAY	YEAR					
X YES (If yes, complete EXPECTED SUBMISSION DATE).				NO						04	11	97					

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

At approximately 1300, on January 09, 1997, with Unit 2 operating at 100% power and Unit 3 shutdown for Forced Outage D3F23, a review of the UFSAR and Conax Buffalo electrical penetration assembly vendor manuals determined that there were two Primary Containment boundaries on Unit 2 and two boundaries on Unit 3 which had never been challenged by a Type B Local Leak Rate Test (LLRT). Revisions were made to the applicable Primary Containment Leakage Rate Testing Program procedures to include these electrical penetrations as testable containment barriers. Upon completion of procedure revisions, these four electrical penetrations were each given a Type B LLRT. Containment integrity has been intact as proven by successful ILRTs performed at the end of numerous ILRT refuel outages. A supplement LER will be submitted to report the cause for the omission of these four electrical penetrations from the LLRT program and its associated testing. The safety significance concerning the omission of testing these four electrical penetrations was minimal:

NRC FORM 366A (5-92)		U.S. NUCLEAR REGULATORY COMMISSION		APPROVED BY OMB NO. 3150-0104 EXPIRES 5/31/95			
LICENSEE EVENT REPORT (LER) TEXT CONTINUATION				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)		DOCKET NUMBER (2)		LER NUMBER (6)		PAGE (3)	
Dresden Nuclear Power Station, Unit 2		05000237		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	2 OF 4
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TEXT (If more space is required, use additional copies of NRC Form 366A) (17)

PLANT AND SYSTEM IDENTIFICATION

General Electric - boiling water reactor - 2527 Mwt rated core thermal power.

Energy Industry Identification System (EIIS) codes are identified in the text as [XX] and are obtained from IEEE Standard 805-1984, IEEE Recommendation Practice for System Identification in Nuclear Power Plants and Related Facilities.

Primary Containment [JM]

EVENT IDENTIFICATION:

Primary Containment Electrical Penetrations Never Subjected to Type B Local Leak Rate Test Due to Break Down of the Modification Process

A. PLANT CONDITIONS PRIOR TO EVENT:

Unit: 2(3) Event Date: 01/09/97 Event Time: 1300 hrs
 Reactor Mode: N(N) Mode Name: Run(Refuel) Power Level: 100(0)
 Reactor Coolant System Pressure: 1005 psig (0 psig)

B. DESCRIPTION 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.

At approximately 1300, on January 09, 1997, with Unit 2 operating at 100% power and Unit 3 shutdown for Forced Outage D3F23, a review of the UFSAR and Conax Buffalo electrical penetration assembly vendor manuals determined that there were two Primary Containment [JM] boundaries on Unit 2 and two boundaries on Unit 3 which had never been challenged by a Type B Local Leak Rate Test (LLRT). These electrical penetrations occupy one of four positions associated with primary containment penetrations X-316A and X-316B, located on the torus catwalk.

The Operating Department Shift Manager (Licensed Senior Reactor Operator (SRO)) was notified by a Problem Identification Form (PIF) and an Operability Determination, issue/concerning screening form was completed. The evaluation determined that the containment was operable, however, a potential concern exists because the penetrations had not been tested. Reasonable assurance that containment integrity was intact was due to the fact that both Unit 2 and Unit 3 passed as-left ILRTs during their last refuel outage. In addition, the inerted containment nitrogen make-up flow rate was not excessive; an indication that there was no breach of primary containment.

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

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

Revisions were made to the LLRT program to include these four Conax electrical penetrations as testable containment barriers. Upon completion of procedure revisions, the four electrical penetrations were each given a Type B LLRT. Each of these LLRTs indicated no leakage through the penetrations. Subsequent completion of the primary containment operability evaluation determined that the concern no longer existed because the successful LLRTs demonstrated that containment is intact and containment leakage is below Technical Specification/Appendix J leakage limits.

Preliminary review indicates that the subject electrical penetrations were installed during modification M12-2-75-43, for Unit 2, and M12-3-75-33, for Unit 3. The modification process in place at that time did not specifically address containment isolation relevancy with respect to the plant design change.

No other system or component inoperabilities have been identified which contributed to the event. In addition, no manual or automatic engineered safety feature (ESF) actuation occurred as a result of this event.

C. CAUSE OF EVENT:

The preliminary root cause of the event appears to be a break down of the modification process (NRC cause code E, Management/Quality Assurance Deficiency). The modification process in place at that time did not specifically address containment isolation relevancy with respect to the plant design change. A supplement to this LER will be submitted to report the cause for the omission of these four electrical penetrations from the LLRT program and its associated testing.

D. SAFETY ANALYSIS:

The safety significance concerning the omission of testing these four electrical penetrations was minimal, since these electric penetration assemblies each indicated no leakage when challenged by Type B LLRTs. If these penetration had been leaking excessively, there could have been a negative impact on the overall dose rate to the Control Room Personnel and the Public.

However, if these penetrations had been leaking an excessive amount, the ILRT would have identified the leakage along with an excessive nitrogen makeup during Unit operation. Containment integrity has been intact as proven by successful ILRTs performed at the end of numerous ILRT refuel outages. In addition, Secondary Containment provides a barrier for leakage past the Primary Containment.

Based on the above, the overall safety significance of this event is minimal.

E. CORRECTIVE ACTIONS:

1. Dresden Technical Procedure (DTP) 47, Leak Rate Testing Program, and Dresden Technical Surveillance (DTS) 1600-04, Local Leak Rate Testing of Electrical Penetrations, were revised to include these four Conax electrical penetrations as testable containment barriers. (Complete)

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

2. The four electrical penetrations were leak tested using a Type B LLRT. Each of these LLRTs yielded a leakage rate of 0 scfh. (Complete)
3. The current modification process, controlled by Dresden Administrative Procedure (DAP) 21-03, Processing Plant Design Changes, was previously revised to include the design change acceptance testing checklist which specifically addresses containment isolation relevancy with respect to the plant design change. (Complete)
4. A walkdown was performed of Conax Buffalo electrical penetration assemblies and they were verified to be part of the Primary Containment Leakage Rate Testing Program. (Complete)
5. The results of the root cause investigation and any significant corrective actions will be reported in a supplement to this LER. This supplement will address prior similar occurrences, the effectiveness of their corrective actions, and the significance of the timing of the changes to the modification process reported in Corrective Action #3. (2371809700101)
6. The Primary Containment penetrations not currently being tested will be reviewed to verify and document testing requirements are being met. (2371809700102)

F. PRIOR SIMILAR OCCURRENCES:

<u>LER/Docket Numbers</u>	<u>Title</u>
95-020/0500237	Primary Containment Boundaries Not Type B Tested 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
94-001/0500237	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

G. COMPONENT FAILURE DATA:

There was no component failure.