NRC FORM 366 (4-95) U.S. NUCLEAR REGULATORY COMMISSION

LICENSEE EVENT REPORT (LER)

APPROVED BY OMB NO. 3150-0104
EXPIRES 04/30/98

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS MANDATORY INFORMATION COLLECTION REQUEST: 50.0 HRS. REPORTED LESSONS LEARNED ARE INCORPORATED INTO THE LICENSING PROCESS AND FED BACK TO INDUSTRY. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE INFORMATION AND RECORDS MANAGEMENT BRANCH (T-6 F33), 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	PAGE (3)
Dresden Nuclear Power Station, Unit 3	05000249	1 of 3

TITLE (4)
Enforcement Discretion Required for Target Rock Safety/Relief Valve Inoperability

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
									N/A	
05	03	99	99	004	00	06	01	99	FACILITY NAME N/A	DOCKET NUMBER

OPERATING MODE (9)	1	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)(2)(v)	X	50.73(a)(2)(i)		50.73(a)(2)(viii)
			20.2203(a)(2)(i)		20.2203(a)(3)(i)		50.73(a)(2)(ii)		50.73(a)(2)(x)
			20.405(a)(1)(ii)		20.2203(a)(3)(ii)		50.73(a)(2)(iii)		73.71
			20.2203(a)(2)(ii)		20.2203(a)(4)		50.73(a)(2)(iv)		OTHER
			20.2203(a)(2)(iii)		50.36(c)(1)		50.73(a)(2)(v)		Specify in Abstract below or in NRC Form 366A
			20.2203(a)(2)(iv)		50.36(c)(2)		50.73(a)(2)(vii)		

LICENSEE CONTACT FOR THIS LER (12)

NAME	TELEPHONE NUMBER (Include Area Code)
Sherry Butterfield ext.: 2959	(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	01	2001

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

At approximately 1951 hours on May 3, 1999, an annuciator indicated a possible pilot valve bellows failure for the Target Rock safety relief valve was received in the Unit 3 control room. The failure of the pilot valve bellows prevents the Target Rock from functioning as a safety valve. Although the pressure safety function is inhibited, the pressure relief capability was not impacted. The action statement associated with an inoperable safety valve required that the unit be in hot shutdown within 12 hours and cold shutdown within the next 24 hours. Preparation for a plant shutdown was commenced. Concurrently, the Notice of Enforcement Discretion (NOED) process was also initiated. At approximately 0215 hours on May 4, 1999, the NRC granted verbal approval of the NOED. The NOED request was docketed on May 4, 1999. Although an NOED was granted, which allows continued operation, current Technical Specification 3.6.E requires the plant to be in hot shutdown in 12 hours and cold shutdown in 24 hours. Unit 3 did not reach hot shutdown in the 12-hour time duration.

The apparent cause has been narrowed to two possibilities, a failure of the bellows or a pressure switch malfunction. However, the root cause of the event will not be determined until the next refueling or an outage of sufficient duration to disassemble and repair the valve. Corrective actions include submittal of an Exigent Technical Specification Amendment.

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. The Target Rock Valve is not assumed to operate in the Plant's Transient Analysis. Therefore, the safety significance of this condition is minimal.

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 Recommended Practice for System Identification in Nuclear Power Plants and Related Facilities.

EVENT IDENTIFICATION:

Enforcement Discretion Required for Target Rock Safety/Relief Valve Inoperbility

A. PLANT CONDITIONS PRIOR TO EVENT:

Unit: 3 Event Date: May 3, 1999 Event Time: 1951 CDT

Reactor Mode: 1 Mode Name: Run Power Level: 100

B. DESCRIPTION OF EVENT:

Dresden Nuclear Station, Unit 3, has 13 safety and relief valves. One of the 13 valves, manufactured by Target Rock, serves a safety and relief function. Technical Specification 3.6.E requires nine valves to be OPERABLE in Modes 1, 2 and 3. With any one valve inoperable, a plant shutdown is required.

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C. CAUSE OF EVENT:

The apparent cause has been narrowed to two possibilities, a failure of the bellows or a pressure switch malfunction. The annunciator cleared subsequent to this event, which indicates that a bellows failure is not apparent. However, the root cause of the event can not be determined until the next refueling or an outage of sufficient duration to disassembly and repair of the valve. Upon completion of the evaluation of this event, a supplemental report will be submitted to the NRC with the final root cause.

D. SAFETY ANALYSIS:

The American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel (B&PV) Code requires that each vessel designed to meet ASME Section III be protected from the consequences of pressures and temperatures in excess of design conditions. Main Steam Safety Valves are sized to protect the reactor vessel against postulated overpressure events. Current TS require nine (9) safety valves to be OPERABLE during MODES 1, 2, and 3. UFSAR Section 5.2.2.2.1 states that the number of valves required for ASME B&PV Code compliance is three (3). The recent cycle specific plant transient analysis assumes only eight valves and does not

credit the Target Rock safety relief valve. In addition, other conservative assumptions used in the transient analyses, such as 103 percent of the setpoint value, the fastest MSIV closure time allowed by TSs, and reduced safety valve flow rates, provide additional assurance that the loss of the safety mode function of the Target Rock valve does not impact the results of the ASME B&PV Code overpressure analysis. Therefore the current TS is overly conservative.

A review of the design basis for Unit 3 indicates that the Target Rock relief function is credited in other accident and transient events; and the relief function remains available. The Target Rock valve safety function is not credited in other design basis events. Therefore, there is no risk associated with having the Target Rock valve safety mode function out of service.

E. CORRECTIVE ACTIONS:

1. ComEd requested exigent review of the proposed amendment pursuant to the provisions of 10 CFR50.91(a)(6)(i)(B)(vi) . (Complete)
2. A supplemental LER will be submitted to the NRC with the final root cause, any significant corrective actions and any previous events.(AR # 8035-09)

F. PREVIOUS OCCURRENCES:

None.

G. COMPONENT FAILURE DATA:

None.