NRC FORM 366 (5-92) | U.S. NUCLEAR REGULATORY COMMISSION | APPROVED BY OMB NO. 3150-0104 EXPIRES 5/31/95

LICENSEE EVENT REPORT (LER)

(See reverse for required number of digits/characters for each block)

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)	DOCKET NUMBER (2)	PAGE (3)
Browns Ferry Nuclear Plant (BFN) Unit 2	05000260	1 OF 5

TITLE (4) AN EXCESS FLOW CHECK VALVE WAS NOT TESTED PER TECHNICAL SPECIFICATIONS REQUIREMENTS DUE TO A DRAWING 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 N/A	DOCKET NUMBER
08	14	95	95	006	00	9	13	95	FACILITY NAME N/A	DOCKET NUMBER

OPERATING MODE (9)	N
POWER LEVEL (10)	100

THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more) (11)

	20.402(b)		20.405(c)		50.73(a)(2)(iv)		73.71(b)
	20.405(a)(1)(i)		50.36(c)(1)		50.73(a)(2)(v)		73.71(c)
	20.405(a)(1)(ii)		50.36(c)(2)		50.73(a)(2)(vii)		OTHER
	20.405(a)(1)(iii)	X	50.73(a)(2)(i)(B)		50.73(a)(2)(viii)(A)		(Specify in Abstract below and in Text, NRC Form 366A)
	20.405(a)(1)(iv)		50.73(a)(2)(ii)		50.73(a)(2)(viii)(B)		
	20.405(a)(1)(v)		50.73(a)(2)(iii)		50.73(a)(2)(x)		

LICENSEE CONTACT FOR THIS LER (12)

NAME	TELEPHONE NUMBER (Include Area Code)
William C. Jones, Compliance Licensing Engineer	(205) 729-7857

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
YES (If yes, complete EXPECTED SUBMISSION DATE).	X	NO				

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

On August 14, 1995, at 1715 hours, TVA determined that an excess flow check valve, which was part of a primary containment boundary, was not tested pursuant to Technical Specifications (TS) 4.7.D.1.d. On discovery of this condition, Limiting Condition for Operation (LCO) 2-95-138-3.7.D was entered requiring the valve to be returned to operable status or have the line isolated by a containment isolation valve in 4 hours. At 1745 hours on August 14, 1995, containment isolation valve 2-RTV-3-240A was closed to isolate this sensing line and the LCO was exited. This condition is reportable per 10 CFR 50.73 (a)(2)(i)(B) as a condition prohibited by the plant's TS. The root cause of this event was inadequate documentation of excess flow check valves included in primary containment boundaries. Specifically, the excess flow check valve was not shown on the appropriate plant drawings. The excess flow check valve will be added to plant drawings and the affected Surveillance Instruction. A review of Unit 2 valves has not found other excess flow check valves that are not identified in the design output documents. Prior to restart of Unit 3 and Unit 1, TVA will also verify excess flow check valves in each unit are identified on design output documents.

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I. PLANT CONDITIONS

At the time of this event, Unit 2 was at approximately 100 percent power. Unit 3 and Unit 1 were shutdown and defueled.

II. DESCRIPTION OF EVENT

A. Event

At 1715 hours Central Daylight Time (CDT) on August 14, 1995, TVA determined that a reportable event existed because excess flow check valve 2-ECKV-3-240A [CKV] had not been tested pursuant to Technical Specification (TS) 4.7.D.1.d. The valve is within the primary containment boundary for vessel sensing line penetration 2-X-28B. A 0.25 inch orifice is installed upstream of the check valve to limit flow on a line break. The event was discovered during the process of revising Site Standard Practice (SSP)-8.7, "Containment Leak Rate Programs."

On discovery of this condition, Operations personnel [utility, licensed] entered Limiting Condition for Operation (LCO) LCO 2-95-138-3.7.D requiring the valve to be returned to operable status or have the line isolated by a containment isolation valve in 4 hours. At 1745 hours on August 14, 1995, containment isolation valve 2-RTV-3-240A [RTV], located upstream of the excess flow check valve, was closed to isolate this line and the LCO was exited.

This event is reportable in accordance with 10 CFR 50.73 (a)(2)(i)(B) as a condition prohibited by the plant's TS.

B. Inoperable Structures, Components, or Systems that Contributed to the Event:

None.

C. Dates and Approximate Times of Major Occurrences:

August 14, 1995 at 1715 hours CDT	TVA discovered an excess flow check valve that had not been tested per TS requirements
at 1725 hours CDT	Entered 4-hour LCO retroactive to 1715
at 1745 hours CDT	Containment isolation valve 2-RTV-3-240A was closed and the LCO was exited

D. Other Systems or Secondary Functions Affected:

None.

E. Method of Discovery:

This condition was discovered during the process of revising SSP-8.7. During this process, TVA determined that excess flow check valve 2-ECKV-3-240A was not shown on the appropriate plant drawings. Upon further investigation, TVA determined that this valve had not been tested pursuant to TS requirements.

F. Operator Actions:

Following the discovery of this condition, Operations personnel entered LCO 2-95-138-3.7.D. Subsequently, Containment Isolation Valve 2-RTV-3-240A was closed to isolate the sensing line and the LCO was exited.

G. Safety System Responses:

None.

III. CAUSE OF THE EVENT

A. Immediate Cause:

The immediate cause of the event was the failure to test excess flow check valve 2-ECKV-3-240A pursuant to TS requirements.

B. Root Cause:

The root cause of the event was inadequate documentation of excess flow check valves that are included in primary containment boundaries. Specifically, the appropriate plant drawings did not show the excess flow check valve. This condition resulted in a failure to test the valve.

IV. ANALYSIS OF THE EVENT

There are no normal reactor operations, automatic safety functions, or engineered safety features which required the usage of the affected check valve. This condition does not seriously compromise plant safety or seriously degrade the plant's principle safety barriers. This condition is only a failure to test an excess flow check valve. This line is seismic category I piping and a 0.25 inch orifice is installed upstream of the check valve to limit flow on a line break. A manual isolation valve downstream of the reactor has been closed to

isolate the line. Therefore, there are no safety consequences associated with this event. Additionally, this event did not adversely affect the health and safety of plant personnel or the general public.

V. CORRECTIVE ACTIONS

A. Immediate Corrective Actions:

Containment isolation valve 2-RTV-3-240A was closed to isolate the sensing line. Operations placed a hold order on this valve to ensure that it remains closed until the check valve is tested.

B. Corrective Actions to Prevent Recurrence:

The excess flow check valve will be added to appropriate plant drawings and the affected SIs. A review of Unit 2 valves has not found other excess flow check valves that are not identified on the design output documents. Prior to restart of Unit 3 and Unit 1, TVA will also verify excess flow check valves in each unit are identified on design output documents.

An evaluation is being performed to determine if the valve is functionally required for Unit operation, or if the valve can be removed and the line capped. If this valve is not removed, TVA will test this valve during the Unit 2 Cycle 8 refueling outage (currently scheduled to begin late March 1996) as required by the TS.[1]

VI. ADDITIONAL INFORMATION

A. Failed Components:

None.

B. Previous LERs on Similar Events:

TVA has previously issued LERs concerning TS required tests that were not performed. None of the previous LERs involved the failure to test excess flow check valves. One LER (259/85-030) addressed the failure to test a containment isolation valve. The event occurred because an SI was not revised to reflect a TS change.

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[1]This valve is tested as part of the reactor vessel operational pressure test.

VII. COMMITMENTS

1. Excess flow check valve 2-ECKV-3-240A will be added to appropriate drawings and the affected SIs by May 14, 1996.

2. If this valve is not removed or disconnected, TVA will test this valve during the Unit 2 Cycle 8 outage as required by the TS.

3. Prior to Unit 3 restart, TVA will verify excess flow check valves in Unit 3 are identified on design output documents.

4. Prior to Unit 1 restart, TVA will verify excess flow check valves in Unit 1 are identified on design output documents.

Energy Industry Identification System (EIIS) system and component codes are identified in the text with brackets (e.g., [XX]).