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FERMONT YANKEE NUCLEAR POWER CORPORATION

P. O. BOX 157 GOVERNOR HUNT ROAD VERNON, VERMONT 05354

> October 13, 1989 VYV 89-196

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

REFERENCE: Operating License DPR-28 Docket No. 50-271 Reportable Occurrence No. LER 89-24

Dear Sirs:

As defined by 10CFR50.73, we are reporting the attached Reportable Occurrence as LER 89-24.

Very truly yours,

VERMONT YANKEE NUCLEAR POWER CORPORATION

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Robert J. Wanczyk Acting Plant Manager

cc: Regional Administrator USNRC Region I 475 Allendale Road King of Prussia, PA 19406

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(9-83)										APPROVED OMS NO.3150-0104												
LICENSEE EVENT REPORT (LER) EXPIRES 8/31/96																						
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(9-83)

NRC Form 304A (9-83) .

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

U.S. NUCLEAR REGULATORY COMMISSION APPROVED OMS NO.3150-0104 EXPIRES 8-31-96

	DUCKET NU. (*) [	LER	PAGE (3)			
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# DESCRIPTION OF EVENT

In order to implement the recently developed Revision 10 of the Vermont Yankee Inservice Testing (IST) Program, various system surveillance procedures were being revised to incorporate program changes. On 9/13/89, while reviewing the Residual Heat Removal (RHR) (EIIS=B0) System surveillance procedure, it was noted that a requirement from previous IST Program Revision 9 had not been incorporated and implemented.

Revision 9 of the IST Program, which was approved on 7/28/88 and implemented on 1/17/89, added a requirement for leak testing RHR valve V10-18 during each refueling outage. (NOTE: Valve V10-18 is the inboard Shutdown Cooling Suction Valve.) It was noted that this testing had not been performed during the 1989 refueling outage because it had not been added to the RHR system surveillance procedure.

## CAUSE OF EVENT

After completion of program changes by the IST Program coordinator, Revision 9 of the IST Program was tracked on the Vermont Yankee commitment system and forwarded, with all changes identified, to the Operations Department to allow for revision of implementing procedures. During revision of the RHR system implementing procedure, the subject valve leak test was omitted. The Operations department developed the procedure revision and provided for its internal review. Although not specifically required, the IST Program coordinator was then requested to provide additional review. The IST Program coordinator provided a cursory review of this and all other procedures necessary to implement Revision 9 of the program. All procedure changes covered by this random review were found to be complete and to adequately reflect program testing requirements. However, the subject valve leak test was not included in the scope of the review. This, coupled with the initial omission of the leak test during procedure development, is determined to be the root cause of this event.

# ANALYSIS OF EVENT

The subject valve, V10-18, is the inboard valve of the Primary Containment Isolation Valve pair for the RHR Shutdown Cooling Suction line penetration. Valve V10-18 and V10-17, the outboard valve at this penetration, have the additional function of providing a piping pressure specification separation. These valves separate Reactor Coolant Pressure from RHR System piping. Although these valves act as Pressure Isolation Valves (PIV's), they have no specific requirement for leak testing in Tech. Spec. Section 3.7.D concerning Primary Containment. Continuous pressure monitoring of this penetration is provided downstream of outboard valve V10-17 for leakage detection.

#### NRC Form 384A (9-83) LICENSEE EVENT REPORT (LER) TEXT CONTINUATION LICENSEE EVENT REPORT (LER) TEXT CONTINUATION EXPIRES 8-31-96

UTILITY NAME (1)	DOCKET NO. (2)	LER	PAGE (	")		
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During development of Revision 9 of the IST Program, Vermont Yankee committed to leak test valve V10-18 during each refueling outage to determine any gross leakage. Corrective action would then be taken per ASME Section XI requirements. Since ASME Section XI testing is referenced in Tech. Spec. 4.6.E.2, this event can be considered a missed Tech. Spec. surveillance. Although the leak test was not performed, system pressure indication downstream of the subject containment penetration has been normal during the current operating cycle.

In addition, it should be noted that although the recently self imposed IST Program leak test requirement was not performed, value stroke time testing was accomplished. Review of this stroke time data shows no indication of value operator degradation. It should also be noted that in the worst case scenario of value V10-18 being inoperable in the fully open position, reactor operation is permitted if the next value downstream is closed.

Based on the above, it is concluded that the integrity of the corresponding Primary Containment penetration is assured via closure of valve V10-17 and continuous pressure monitoring.

Therefore, during the events of this report and for the remainder of the current operating cycle, there is reasonable assurance that there are no adverse safety implications to plant equipment, personnel, or to the public.

### CORRECTIVE ACTION

The requirement for leak testing V10-18 will be incorporated into the corresponding implementing procedure prior to the next refueling outage. A review is in progress to ensure all other IST Program implementing procedures adequately address all testing required by the program. This review will be completed by the beginning of November, 1989. In addition, this event has been reviewed with the affected personnel responsible for procedure development and review.

To further preclude recurrence of a similar event, future changes to implementing procedures involving IST Program revisions will be routed to the IST Program Coordinator for a complete review.

### ADDITIONAL INFORMATION

Previous similar events have been reported to the Commission, in the last five years, as LER 87-04 and LER 89-20.