CCN # 14057

PEACH BOTTOM—THE POWER OF EXCELLENCE

PHILADELPHIA ELECTRIC COMPANY
PEACH BOTTOM ATOMIC POWER STATION
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Delta, Pennsylvania 17314
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April 24, 1991

Docket No. 50-278

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

SUBJECT: Licensee Event Report
Peach Bottom Atomic Power Station - Unit 3

This LER concerns Primary Containment Isolation Valve logging not being performed as required by Technical Specifications due to personnel error.

Reference:	Docket No. 50-278
Report Number:	3-91-004
Revision Number:	00
Event Date:	03/24/91
Report Date:	04/24/91
Facility:	Peach Bottom Atomic Power Station RD 1, Box 208, Delta, PA 17314

This LER is being submitted pursuant to the requirements of 10 CFR 50.73(a)(2)(i)(B).

Sincerely,

John Gray

cc: J. J. Lyash, USNRC Senior Resident Inspector
T. T. Martin, USNRC, Region I

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NRC Form 366
(9-83)

U.S. NUCLEAR REGULATORY COMMISSION
APPROVED OMB NO. 3150-0104
EXPIRES: 8/31/88

LICENSEE EVENT REPORT (LER)

FACILITY NAME (1)	DOCKET NUMBER (2)	PAGE (3)
Peach Bottom Atomic Power Station -- Unit 3	0 5 0 0 0 2 7 8	1 OF 0 3

TITLE (4) Primary Containment Isolation Valve Logging Not Performed as Required by Technical Specifications due to Personnel Error

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 NAMES	DOCKET NUMBER(S)
0 3	2 4	9 1	9 1	— 0 0 4 —	0 0	0 4	2 4	9 1		0 5 0 0 0
										0 5 0 0 0

OPERATING MODE (9): N

POWER LEVEL (10): 0 7 4

THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more of the following) (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)	50.38(c)(2)	50.73(a)(2)(vii)	OTHER (Specify in Abstract below and in Text, NRC Form 366A)
20.405(a)(1)(iii)	X 50.73(a)(2)(i)	50.73(a)(2)(viii)(A)	
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 (AREA CODE)
A. A. Fulvio , Regulatory Engineer	7 1 7 4 5 6 - 7 0 1 4

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 fifteen single-space typewritten lines) (16)

On 3/24/91 and 3/25/91, a Technical Specification (Tech Spec) violation occurred when the Unit 3 Reactor Operator (RO) failed to initial Surveillance Test (ST) 5.3, "Inoperable Isolation Valve Position Daily Log", signifying that he had verified containment penetrations containing inoperable isolation valves were isolated as required by Tech Specs. The cause of this event is personnel error due to failure to follow procedure. ST 5.3 requires the RO to initial daily that he has verified the penetration is isolated. Corrective actions include routing the pertinent information from this LER to the appropriate Operations personnel and reviewing the on the job portion of the licensed operator training program. The RO involved in this event was counselled and coached by Shift Management following the incident on the performance of administrative tasks associated with the RO's responsibilities. There were no safety consequences as a result of this event.

FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6) YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	PAGE (3)
Peach Bottom Atomic Power Station Unit 3	0 5 0 0 0 2 7 8	9 1	— 0 0 4	— 0 0	0 2 OF 0 3

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

Requirements for the Report

This report is being submitted pursuant to 10 CFR 50.73(a)(2)(i)(B) as a result of Technical Specification (Tech Spec) required inoperable isolation valve positions not being recorded daily.

Unit Conditions at Time of Event (3/24/91 and 3/25/91)

Power ascension was in progress on Unit 3 following a load drop for rod pattern adjustment and reactor feed pump maintenance. The mode switch was in the RUN position. Reactor thermal power was between 74% to 99% during the time of the event.

Description of the Event

On 3/24/91 and 3/25/91, a Tech Spec violation occurred when the Unit 3 Reactor Operator (RO) failed to initial Surveillance Test (ST) 5.3, "Inoperable Isolation Valve Position Daily Log", documenting that he had verified containment penetrations containing inoperable isolation valves were isolated. Tech Spec 4.7.D.2 requires that the position of at least one other valve in each line having an inoperable isolation valve be recorded daily. The inoperable isolation valves in question were solenoid valve (SV)-3671B Oxygen (O2) Analyzer Sample valve and Motor Operated (MO)-3-10-017 RHR Shutdown Cooling Suction valve. The SV-3617B penetration was isolated by hand valve (HV)-3-7D-50134 in the closed position under Shift Permit 3-90-192. The Shutdown Cooling suction penetration was isolated by MO-3-10-017 de-energized in the closed position and MO-3-10-018 maintained closed under Shift Permit 3-10-108.

The day shift RO on 3/26/91 discovered that ST 5.3 had not been initialed on 3/24/91 and 3/25/91. The RO on 3/26/91 was different from the RO on 3/24/91 and 3/25/91. The position of the valves in question were verified and it was verified that the penetrations had not been opened on the two days the ST had not been initialed. The RO who missed the signoffs indicated that he had verified the position of the valves during shift turnovers but forgot to initial ST 5.3.

Cause of the Event

The cause of this event was determined to be personnel error. The day shift RO (Utility, Licensed) failed to record the position of the inoperable isolation valves daily as required by ST 5.3 and Tech Spec 4.7.D.2. The On The Job Training (OJT) portion of the Licensed Operator Training Program includes this Tech Spec requirement, however, it may have been less than effective.

Analysis of the Event

No actual safety consequences occurred as a result of this event. Tech Spec 4.7.D.2 requires that the position of the valve used to isolate a primary containment penetration containing an inoperable isolation valve be recorded daily. Per ST 5.3, if the position of the valve in question cannot be determined from the Control Room, verifying that the Shift permit is still applied is adequate. Since the Shift Permits for both valves in question have red blocking tags, a Temporary Clearance would be required to reposition the valves. A review of the Shift Permits showed that neither Shift Permit has been temporarily cleared since applied. Therefore, although the position of the valves was not recorded, the penetrations did remain isolated on 3/24/91 and 3/25/91.

Corrective Actions

The RO involved in this event was counselled and coached by Shift Management following the incident on the performance of administrative tasks associated with the RO's responsibilities.

The pertinent information contained in this LER will be routed to the appropriate Operations personnel.

The OJT portion of the Licensed Operator Training program will be reviewed for adequacy and corrective action taken as necessary.

Previous Similar Events

There were three previous similar events identified. LER 2-89-027 concerned not logging the Suppression Pool temperature when required by Tech Specs. LER 3-90-009 concerned not logging the 'B' Recirculation loop temperature when required by Tech Specs. LER 3-90-015 concerned not logging Drywell sump flow readings as required by Tech Specs. Corrective actions could not have prevented this event since they mainly concerned informing appropriate Operations personnel of the specific events or other programmatic corrective actions pertaining to the events. The corrective action for this event concerning reviewing the OJT portion of the licensed operator training program is expected to more generically address data logging problems.