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D. F. Packer
General Manager
Plant Operations
Waterford 3

W3F1-94-0050
A4.05
PR

May 13, 1994

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

Subject: Waterford 3 SES
Docket No. 50-382
License No. NPF-38
Reporting of Licensee Event Report

Gentlemen:

Attached is Licensee Event Report Number LER-94-005-00 for Waterford Steam Electric Station Unit 3. This Licensee Event Report is submitted in accordance with 10CFR50.73(a)(2)(i).

Very truly yours,

D.F. Packer
General Manager
Plant Operations

DFP/GCS/tjs
Attachment

cc: L.J. Callan, NRC Region IV
G.L. Florreich
J.T. Wheelock - INPO Records Center
R.B. McGehee
N.S. Reynolds
NRC Resident Inspectors Office (WADM526)
Administrator - LRPD

IE22

NRC FORM 366 (5-92) U.S. NUCLEAR REGULATORY COMMISSION

APPROVED BY OMB NO. 3150-0104
EXPIRES 5/31/95

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.

LICENSEE EVENT REPORT (LER)

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

FACILITY NAME (1)	DOCKET NUMBER (2)	PAGE (3)
Waterford Steam Electric Station Unit 3	05000	1 OF 5

TITLE (4)
Valves in the Inservice Test Plan - Pump and Valve, not Tested

EVENT DATE (5)			LER NUMBER (6)			REPORT NUMBER (7)			OTHER FACILITIES INVOLVED (8)	
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	MONTH	DAY	YEAR	FACILITY NAME	DOCKET NUMBER
									n/a	05000
04	15	94	94	-- 005 --	00	05	13	94	FACILITY NAME: n/a	DOCKET NUMBER: 05000

OPERATING MODE (9)	5
POWER LEVEL (10)	0

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)		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)
John Houghtaling, Mgr. Tech. Services	504/464-3131

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 April 15, 1994, a Shift Technical Advisor discovered that several valves were not being tested per the requirements of ASME section XI. Specifically valves SI-6011, SI-6012, CVR-401A and CVR-401B remote position indicators were not being observed at least once every two years to verify that valve position matched remote indication. Also identified was that power operated valves SBV-113A, SBV-113B, SBV-114A and SBV-114B were not being timed in their closed stroke direction. Technical Specification 4.0.5(a) requires that inservice testing of ASME Code Class 1, 2, and 3 pumps and valves be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code.

The root cause of this event is inappropriate action resulting in a failure to properly incorporate IST Plan requirements into the appropriate operating procedures during initial IST Plan implementation. A Pump & Valve Review Team has been established to perform an in depth review of the Plan and the associated implementing documents. This event did not compromise the health and safety of the public.

REQUIRED NUMBER OF DIGITS/CHARACTERS
FOR EACH BLOCK

BLOCK NUMBER	NUMBER OF DIGITS/CHARACTERS	TITLE
1	UP TO 46	FACILITY NAME
2	8 TOTAL 3 IN ADDITION TO 05000	DOCKET NUMBER
3	VARIES	PAGE NUMBER
4	UP TO 76	TITLE
5	6 TOTAL 2 PER BLOCK	EVENT DATE
6	7 TOTAL 2 FOR YEAR 3 FOR SEQUENTIAL NUMBER 2 FOR REVISION NUMBER	LER NUMBER
7	6 TOTAL 2 PER BLOCK	REPORT DATE
8	UP TO 18 -- FACILITY NAME 8 TOTAL -- DOCKET NUMBER 3 IN ADDITION TO 05000	OTHER FACILITIES INVOLVED
9	1	OPERATING MODE
10	3	POWER LEVEL
11	1 CHECK BOX THAT APPLIES	REQUIREMENTS OF 10 CFR
12	UP TO 50 FOR NAME 14 FOR TELEPHONE	LICENSEE CONTACT
13	CAUSE VARIES 2 FOR SYSTEM 4 FOR COMPONENT 4 FOR MANUFACTURER NPRDS VARIES	EACH COMPONENT FAILURE
14	1 CHECK BOX THAT APPLIES	SUPPLEMENTAL REPORT EXPECTED
15	6 TOTAL 2 PER BLOCK	EXPECTED SUBMISSION DATE

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15	6 TOTAL 2 PER BLOCK	EXPECTED SUBMISSION DATE

REPORTABLE OCCURRENCE

On April 15, 1994, a Shift Technical Advisor discovered that valves were not being tested per the requirements of ASME section XI. Specifically valves SI-6011 (EIIS Identifier BP-FSV), SI-6012 (EIIS Identifier BP-FSV), CVR-401A (EIIS Identifier BF-FSV) and CVR-401B (EIIS Identifier BF-FSV) remote position indicators were not being observed at least once every two years to verify that their valve operators were accurately indicated as per the requirements of ASME Section XI Article IWV-3300. Also power operated valves SBV-113A (EIIS Identifier VC-20), SBV-113B (EIIS Identifier VC-20), SBV-114A (EIIS Identifier VC-20) and SBV-114B (EIIS Identifier VC-20) were not being timed in their closed stroke direction as per the requirements of ASME Section XI Article IWV-3413(b). Technical Specification 4.0.5(a) requires that inservice testing of ASME Code Class 1, 2, and 3 pumps and valves be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code. The failure to test these valves per ASME section XI requirements is a violation of Waterford 3 Technical Specification 4.0.5(a) which requires testing of ASME code class 1, 2, and 3 pumps and valves. Per 10CFR50.73(a)(2)(i)(B) any operation or condition prohibited by the plant's Technical Specification is reportable as an LER.

INITIAL CONDITIONS

Plant Power	0%
Plant Operating Mode:	Mode 5; Cold Shutdown
Procedures Being Performed Specific to This Event:	None
Technical Specification LCO's in Effect Specific to this Event:	None
Major Equipment Out of Service Specific to this Event:	None

EVENT SEQUENCE

On April 15, 1994 a Shift Technical Advisor (STA) discovered during a review of the Waterford 3 Pump and Valve Inservice Test Plan (IST) that valves SI-6011, SI-6012, CVR-401A, CVR-401B, SBV-113A, SBV-113B, SBV-114A and SBV-114B were in the IST plan as required but their testing requirements were only partially addressed in the plant's implementing procedures.

Valves SI-6011, SI-6012, CVR-401A and CVR-401B have been in the IST Plan since revision 1 dated April 4, 1984. The ASME Section XI requirement to verify that valve position indicators are accurately indicating has never been proceduralized and consequently never verified. Valves SBV-113A, SBV-113B, SBV-114A and SBV-114B have been in the IST Plan since revision 0 dated August 16, 1982. The ASME Section XI requirement to time these valves in the closed stroke direction has also never been proceduralized and consequently never verified.

CAUSAL FACTORS

The root cause of this event is inappropriate action resulting in a failure to properly incorporate IST Plan requirements into the appropriate operating procedures during initial IST Plan implementation. Although past corrective actions associated with the IST problems appeared to be adequate, it is believed that due to the accumulation of unrelated concerns identified with the Plan, a full review of it and its implementing documents is warranted.

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IMMEDIATE CORRECTIVE MEASURES

The required IST testing of valves SI-6011, SI-6012, CVR-401A, and CVR-401B was performed on April 17, 1994 per work authorization WA 01123100. A procedure change for OP-903-043 was initiated to time the closure of valves SBV-113A, SBV-113B, SBV-114A and SBV-114B per the requirement of the IST plan.

ACTIONS TO PREVENT RECURRENCE

A Pump & Valve Review Team has been established to perform an in depth review of the IST Plan to ensure all current IST requirements are procedurally implemented.

A periodic test method will be implemented for valves SI-6011, SI-6012, CVR-401A and CVR-401B to verify valve position indications.

SAFETY SIGNIFICANCE

The purpose of the inservice testing of the valves identified in this LER was to determine the amount of valve degradation. Upon the discovery that valves SI-6011, SI-6012, CVR-401A, and CVR-401B position indicators were not being verified they were immediately tested and proven to be operational.

Although plant procedures have no time requirement associated with stroking these valves closed, valves SBV-113A, SBV-113B, SBV-114A, and SBV-114B were stroked in both the open and close position per plant procedure OP-903-043

" Shield Building Ventilation System Operability Check" . As such, the operability of the valves was demonstrated.

Based on the above, this event did not compromise the health and safety of the general public or plant personnel.

SIMILAR EVENTS

Problems with the IST Plan were identified in LER 89-014 and LER 90-010. In LER 89-014 the Auxiliary Component Cooling Water valves (EIIS Identifier BI-V) ACC-116A and ACC-116B were not included in the Pump & Valve IST program. The root cause of this event was misinterpretation of the ASME Section XI definition of 'active ' valves. Because ACC-116A and ACC-116B were judged to be 'passive' in relation to the ASME XI definition , they were never included in the IST program. In LER 90-010 feedwater check valves, FW-181A and FW-181B, and both Emergency Diesel Generator fuel oil transfer pumps had been excluded from the Pump & Valve IST program. The root cause of this event was an inadequate review of ASME Section XI IST requirements during the development of the Pump & Valve IST Plan program. Although these events are related to the events described in this LER, the significant difference is that for the events of this LER there were no discrepancies identified with the Pump and Valve IST plan but with the procedural implementation of the plan.