



SUPPLEMENT TO CAUSE DESCRIPTION

THE ANALYSIS REVEALED THAT THE PIPING AT THE CONTAINMENT AIR SAMPLING PENETRATIONS WAS OVERSTRESSED BEYOND THE CODE ALLOWABLE FOR OPERATING BASIS EARTHQUAKE (O.B.E.) AND DESIGN BASIS EARTHQUAKE (D.B.E.) DESIGN CONDITIONS. THE OVERSTRESS WAS CAUSED BY THE ADDITIONAL MASS INTRODUCED BY MOUNTING THE PADLOCKS/CHAINS TO THE ISOLATION VALVES AT THESE PENETRATIONS. THE PADLOCKS/CHAINS WERE PREVIOUSLY INSTALLED DURING MARCH 1980 AS A CORRECTIVE MEASURE TO PREVENT MIS-ALIGNMENT OF THESE VALVES AND TO INSURE CONTAINMENT INTEGRITY.

IMMEDIATE CORRECTIVE ACTION WAS INITIATED BY REMOVING THE PADLOCKS/CHAINS AND REPLACING THEM WITH A LIGHTWEIGHT SEAL. THIS WAS PERFORMED AT PENETRATIONS CPN-76 AND 89. IN ADDITION, AN INSPECTION, CONSISTING OF A WALKDOWN OF ALL SAMPLING AND INSTRUMENT PENETRATIONS, WAS PERFORMED AND REVEALED ADDITIONAL PADLOCKS/CHAINS AT CPN 32 AND 67. THESE PADLOCKS/CHAINS WERE ALSO IMMEDIATELY REMOVED AND REPLACED WITH A LIGHTWEIGHT SEAL.

A REVIEW OF LICENSEE EVENT REPORTS DID NOT REVEAL ANY COMMITMENTS MADE TO A SPECIFIC LOCKING ARRANGEMENT ON THE VALVE AT THE SAMPLING AND INSTRUMENT PENETRATIONS. A PLANT CONDITION REPORT (1-2-80-80) DID INDICATE THIS METHOD OF LOCKING WITH A METAL PADLOCK TO ENSURE PROPER VALVE POSITION. A REVISED STATEMENT OF THE NEW METHOD OF SEALING THE VALVES HAS BEEN NOTED AND THE CONDITION REPORT FILE UPDATED.

ATTACHMENT TO LER #82-040/01T-0

THE SAMPLING PROCEDURE WAS MODIFIED TO INSURE THE SEALS ARE REPLACED ON THE CONTAINMENT ISOLATION VALVES AFTER SAMPLING IS COMPLETED. IN ADDITION, A PLANT MANAGER STANDING ORDER HAS BEEN ISSUED THAT RESTRICTS THE ADDITION OF SIGNIFICANT MASS TO CONTAINMENT ISOLATION VALVES ON SAMPLING OR INSTRUMENT LINES AT PENETRATIONS WITHOUT CONSIDERATION TO OPERATING BASIS EARTHQUAKE (O.B.E.) AND DESIGN BASIS EARTHQUAKE (D.B.E.) DESIGN CONDITIONS.