

50-275/323-0CA-2
I-MFP-58A

17111 EXHIBIT 58A

Pacific Gas and Electric Company

77 Beale Street, Room 1451
P.O. Box 770000
San Francisco, CA 94177
415.973-4684
Fax 415.973-2313

Gregory M. Rueger
Senior Vice President and
General Manager
Nuclear Power Generation

'93 OCT 28 P 6:30

May 25, 1993

PG&E Letter No. DCL-93-128

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

Re: Docket No. 50-275, OL-DPR-00
Diablo Canyon Unit 1
Licensee Event Report 1-92-030-00
Technical Specification 3.7.3.1 Not Met When Valves Were Not
Sealed Open or Periodically Verified to be Open Due to Personnel
Error

Gentlemen:

PG&E is submitting the enclosed Licensee Event Report pursuant to 10 CFR 50.73(a)(2)(i)(B) concerning the violation of Technical Specification (TS) 3.7.3.1 due to valves, which are required to be sealed open or periodically verified to be open, having not been sealed open nor verified to be open within the required TS surveillance interval.

This event has in no way affected the health and safety of the public.

Sincerely,

Gregory M. Rueger

cc: Ann P. Hodgdon
John B. Martin
Mary H. Miller
Sheri R. Peterson
CPUC
Diablo Distribution
INPO

DC1-93-OP-N024

Enclosure

1116S/85K/PGD/2246

NUCLEAR REGULATORY COMMISSION

Docket No. 50-275-CLA Official Ex. No. 7MFP-58A
 In the matter of PACIFIC GAS & ELECTRIC CO

Staff _____ RECEIVED _____
 Approved _____ RECEIVED _____
 Filed _____ RECEIVED
 By _____
 Date Ann Riley & Assoc's 8-18-93
 Other _____ Witness _____
 Reporter Jollie Feigel

9401110129 930818
PDR ADOCK 05000275
PDR

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)			PAGE (3)
DIABLO CANYON UNIT 1	0 5 0 0 0 2 7 5	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	2 OF 6
		92	- 0 3 0	- 0 0	

TEXT (17)

I. Plant Conditions

Unit 1 was in Mode 1 (Power Operation) at 100 percent power.

II. Description of Event

A. Summary:

On December 13, 1992, with Unit 1 in Mode 1 at 100 percent power, Technical Specification (TS) 3.7.3.1 was not met when component cooling water (CCW) system (CC) valves CCW-1-161 and CCW-1-162 (CC)(V) were not sealed open as required to demonstrate operability of the CCW loops or verified to be open within the required 31-day surveillance interval of TS 4.7.3.1.a, including the 25 percent allowable extension of TS 4.0.2.

On April 25, 1993, during reverification of the sealed valve checklist Operating Procedure (OP) K-10E4, "Sealed Valve Checklist for Component Cooling Water Vital Headers A and B," valves CCW-1-161 and CCW-1-162 were identified to be open but not sealed. This checklist had last been satisfactorily performed on October 21, 1992.

B. Background:

OP K-10E4 requires valves CCW-1-161 and CCW-1-162 to be sealed open during Modes 1, 2 (Startup), 3 (Hot Standby), and 4 (Hot Shutdown).

TS 3.7.3.1 requires two CCW loops to be operable in Modes 1, 2, 3, and 4.

TS 4.7.3.1 demonstrates the operability of the two CCW loops by verifying the correct position, at least once per 31 days, of each valve that services safety-related equipment and is not locked, sealed, or otherwise secured in its correct position.

C. Event Description:

On October 21, 1992, operators were in the process of realigning the CCW System following the Unit 1 fifth refueling outage (1R5). The CCW system had been declared "controlled" in accordance with the procedure on Plant Status Controls and valve alignments were in progress. The OP K-10E4 sealed valve checklist on the CCW system had almost been completed by operators except for a few valves still under clearances. Valves CCW-1-161 and CCW-1-162, which are the valves for the CCW supply/return for the Safety Injection (SI) Pump 1-1 (BQ)(P) lube oil and seal coolers (HX) had been verified to be sealed open by the partially completed checklist.

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)			PAGE (3)		
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER			
DIABLO CANYON UNIT 1	0 5 0 0 0 2 7 5	92	-	0 3 0	-	0 0	3 OF 6

TEXT (17)

On October 22, 1992, the SI Pump 1-1 seals leaked during a test run. A clearance was issued for seal repairs. The clearance return-to-service positions for the CCW valves as well as the SI Pump 1-1 discharge and recirculation isolation valves were correctly identified to be sealed open. However, since the OP K-10E4 checklist had been previously completed for these valves, no sealed valve change form was issued with the clearance. The operators establishing the clearance broke the seals on valves CCW-1-161 and CCW-1-162 and closed them in accordance with the clearance.

On October 23, 1992, the remaining valves on the OP K-10E4 sealed valve checklist were sealed and the checklist was signed off by the on-watch Shift Foreman (SFM).

On October 25, 1992, the maintenance crews had completed repairs of the SI Pump 1-1 seals and completed a "Report Off For Testing" (ROFT) request for a test run. Since this was only a post-maintenance test, the ROFT position for each of the valves was open, instead of sealed open. The test was satisfactorily run and the maintenance foreman and the SFM reported off the clearance. The Senior Control Operator stamped the master clearance "SEE ROFT" for each point that had been ROFTed and processed the clearance. The operators removing the clearance had no sealed valve change form; therefore, no seals were installed. (No further activities were performed on SI Pump 1-1, so it is conservatively assumed that the valves remained open but unsealed for the next six months.)

On November 4, 1992, Unit 1 entered Mode 4. TS 3.7.3.1 requires two CCW loops operable in Modes 1, 2, 3, and 4. TS 4.7.3.1 demonstrates operability by verifying the correct position, at least once per 31 days, of each valve that services safety-related equipment and is not locked, sealed, or otherwise secured in its correct position. Since the position of CCW-1-161 and CCW-1-162 had been verified on October 25, 1992, the TS operability requirements were thought to be met for the mode change.

On December 13, 1992, with Unit 1 in Mode 1 at 100 percent power, TS 3.7.3.1 was not met when valves CCW-1-161 and CCW-1-162 were not sealed open as required to demonstrate operability of the CCW loops or verified open within the required 31-day surveillance interval of TS 4.7.3.1.a, including the allowable 25 percent extension of TS 4.0.2.

On April 25, 1993, during a routine six-month walkdown surveillance to verify the OP K-10E4 sealed valves checklist, valves CCW-1-161 and CCW-1-162 were found open but not sealed open as required.

TS 4.7.3.1.a requires that each CCW valve that serves safety-related equipment and that is not locked, sealed, or otherwise secured in position be checked every 31 days. Therefore, the seals had not been

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

FACILITY NAME (1) DIABLO CANYON UNIT 1	DOCKET NUMBER (2) 0 5 0 0 0 2 7 5	LER NUMBER (6)			PAGE (3)
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	4 OF 6
		92	- 0 3 0	- 0 0	

TEXT (17)

installed on October 25, 1992, and were not in place during entry into Mode 4 on November 4, 1992, such that the 31-day surveillance interval, including the 25 percent extension, was exceeded on December 13, 1992. Following discovery on April 25, 1993, CCW-1-161 and CCW-1-162 were verified to be open and new valve seals were installed.

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

None.

E. Dates and Approximate Times for Major Occurrences:

1. October 21, 1992: Valves CCW-1-161 and CCW-1-162 were verified to be sealed open.
2. October 22, 1992: Clearance established for SI Pump 1-1 seal repair. Valve CCW-1-161 and CCW-1-162 seals were removed and valves were repositioned closed.
3. October 25, 1992: Clearance reported off. Valves CCW-1-161 and CCW-1-162 were left in open position but not sealed.
4. November 4, 1992: Unit 1 entered Mode 4.
5. December 13, 1992: Event date. The 31-day surveillance requirement of TS 4.7.3.1.a for CCW-1-161 and CCW-1-162 position verification, including the 25 percent allowable extension of TS 4.0.2, was exceeded.
6. April 25, 1993: Discovery date. Routine reverification identified valves CCW-1-161 and CCW-1-162 as open but not sealed open.

F. Other Systems or Secondary Functions Affected:

None.

G. Method of Discovery:

During the performance of a routine six-month walkdown surveillance, utility personnel identified the problem.

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

FACILITY NAME (1) DIABLO CANYON UNIT 1	DOCKET NUMBER (2) 0 5 0 0 0 2 7 5	LER NUMBER (6)	PAGE (3) *								
		<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <th style="width: 25%;">YEAR</th> <th style="width: 25%;">SEQUENTIAL NUMBER</th> <th style="width: 25%;">REVISION NUMBER</th> <th style="width: 25%;"></th> </tr> <tr> <td style="text-align: center;">92</td> <td style="text-align: center;">- 0 3 0</td> <td style="text-align: center;">- 0 0</td> <td style="text-align: center;">5</td> </tr> </table>	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER		92	- 0 3 0	- 0 0	5	5 of 6
YEAR	SEQUENTIAL NUMBER	REVISION NUMBER									
92	- 0 3 0	- 0 0	5								

TEXT (17)

H. Operator Actions:

Valves CCW-1-161 and CCW-1-162 were verified to be open and were sealed in that position.

I. Safety System Responses:

None required.

III. Cause of the Event

A. Immediate Cause:

Subsequent to completion of the OP K-10E4 checklist verification, valves CCW-1-161 and CCW-1-162 were repositioned for maintenance and then left in an unsealed condition.

B. Root Cause:

The root cause of this event is personnel error in that the SFM who reported off the clearance did not review the clearance in sufficient detail to determine that the ROFT position (open) was not the same as the required position (sealed open); therefore, the SFM did not ensure that the seals were reinstalled on CCW-1-161 and CCW-1-162 as required by OP2.ID1, "DCPP Clearance Process."

C. Contributory Cause:

Administrative controls for the time period between installing the seal on the valves and SFM approval of the sealed valve checklist were inadequate to ensure valve seals were in place on all sealed valves (i.e., no sealed valve change form was issued to control reinstallation of the broken valve seals following SI Pump 1-1 maintenance).

IV. Analysis of the Event

The purpose of the SI system is to inject water into the core in the event of a break in the reactor cooling system (RCS)(AB) or main steam (MS) system (SB). SI pumps are, therefore, required to be operational in Modes 1, 2, and 3.

Surveillance Test Procedure (STP) P-1B, "Routine Surveillance Test of Safety Injection Pumps," verifies the operability of SI pumps quarterly in Modes 1, 2, and 3. STP P-1B also verifies CCW flow through the pump's lube oil and seal water coolers and, therefore, that the CCW inlet and outlet valves for the particular SI pump tested are in the open position. STP P-1B was successfully performed for SI Pump 1-1 on November 2, 1992, January 14, 1993, and February 10, 1993.

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)			PAGE (3)				
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	6	OF	6		
DIABLO CANYON UNIT 1	0 5 0 0 0 2 7 5	92	-	0 3 0	-	0 0	6	OF	6

TEXT (17)

The IR5 maintenance activities, the documented surveillances, and the sealed valve checklist walkdown show that valves CCW-1-161 and CCW-1-162 were in the open position on October 25, 1992, November 2, 1992, January 14, 1993, February 10, 1993, and April 25, 1993. Thus, PG&E has a reasonable degree of assurance that these valves were open continuously from October 25, 1992 through April 25, 1993. Therefore, SI Pump 1-1 was capable of performing its intended safety function throughout this period.

Thus, the health and safety of the public were not adversely affected by this event.

V. Corrective Actions

A. Immediate Corrective Actions:

1. Valves CCW-1-161 and CCW-1-162 were verified to be open and were sealed in that position.
2. All Unit 1 sealed valve checklists that were due to be performed in the next several months were reviewed to ensure that no additional valves were not in their required condition.

B. Corrective Actions to Prevent Recurrence:

1. An Operations Incident Summary has been issued describing the omission of the valve CCW-1-161 and CCW-1-162 seals.
2. Procedure OP1.DC20, "Sealed Components," which controls performance of all the Diablo Canyon sealed component checklists, will be revised to require that all accessible Category 1 sealed valves to be verified within 31 days of Mode 4 entry following a refueling outage. Additionally, OP1.DC20 will be revised to require all administrative controls for completed sealed valve checklists be instituted on issuance of the sealed valve checklist for performance.

VI. Additional Information

A. Failed Components:

None.

B. Previous Similar Events:

None.