

## LICENSEE EVENT REPORT

CONTROL BLOCK: 1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31 32 33 34 35 36 37 38 39 40 41 42 43 44 45 46 47 48 49 50 51 52 53 54 55 56 57 58 59 60 61 62 63 64 65 66 67 68 69 70 71 72 73 74 75 76 77 78 79 80 81 82 83 84 85 86 87 88 89 90 91 92 93 94 95 96 97 98 99 100

(PLEASE PRINT OR TYPE ALL REQUIRED INFORMATION)

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EVENT DESCRIPTION AND PROBABLE CONSEQUENCES (10)

0 2 During a review of Unit No. 2 1982 LLRT results, it was determined that certain

0 3 containment isolation valves (CIV) which had been previously omitted or deleted from

0 4 the Unit No. 2 LLRT procedure were also not addressed in the Unit No. 1 LLRT procedure.

0 5 As a result of this discovery, Unit No. 1 was shut down to permit LLRT of each

0 6 containment isolation valve in accordance with 10CFR50 Appendix J criteria.

0 7 Technical Specifications 3.6.1.1, 6.9.1.9b

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0 9

17 LER/RO REPORT NUMBER 8 2

18 ACTION TAKEN X

19 FUTURE ACTION X

20 EFFECT ON PLANT A

21 SHUTDOWN METHOD A

22 HOURS 0 0 7 2

23 ATTACHMENT SUBMITTED Y

24 NPD-4 FORM SUB. Y

25 PRIME COMP. SUPPLIER A

26 COMPONENT MANUFACTURER Z 9 9 9

27 CAUSE DESCRIPTION AND CORRECTIVE ACTIONS

1 0 Responsible personnel who determined and resolved the LLRT deficiency on Unit No. 2

1 1 failed to recognize this condition also applied to Unit No. 1. All Unit No. 1 CIVs

1 2 will be tested in accordance with 10CFR50 Appendix J criteria prior to startup of

1 3 Unit No. 1. An evaluation is in progress to ensure all CIVs are listed in the LLRT

1 4 program of both units.

1 5 FACILITY STATUS E 0 8 1

1 6 ACTIVITY CONTENT Z Z

1 7 PERSONNEL EXPOSURES 0 0 0 Z

1 8 PERSONNEL INJURIES 0 0 0

1 9 LOSS OF OR DAMAGE TO FACILITY TYPE Z

2 0 PUBLICITY ISSUED N

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NAME OF PREPARER M. J. PASTVA, JR.

PHONE: 919-457-9521

LER ATTACHMENT - RO #1-82-88

Facility: BSEP Unit No. 1

Event Date: July 16, 1982

During June 1982, a number of containment isolation valves (CIVs) were added to PT-20.3 as temporary revisions specifically for Unit No. 2 LLRT tests which were being performed at the time. A review was then made to determine if these valves had previously been required and, if so, why they were deleted. In addition, the reason for revising Unit No. 2 and not Unit No. 1 was to be determined.

Our review indicated that the valves added to the subject PT fell into three categories. Those valves listed on Attachment 1 appeared not to have been previously included in the PT. Valves listed in Attachment 2 were deleted by revision 4 to PT-20.3, dated May 16, 1977. In addition, those valves listed on Attachment 3 were deleted by revision 11 to PT-20.3, dated April 20, 1981.

The basis for revision 4 to the test procedure included a definition of containment isolation valve. Appendix J.II.B defines a containment isolation valve to be one relied upon to perform a containment isolation function. It was further reasoned on the basis that instrument valves were not considered to be containment isolation valves in that they do not automatically close on any containment isolation signal. These valves were not designed to be containment isolation valves and are supposed to stay open under all accident conditions according to the basis. Additional information was given; namely, that other plants (H. B. Robinson, Hatch, Dresden, and Brown's Ferry) did not consider these valves to be containment isolation valves. The inadequacy appears to have been caused by a misinterpretation of Appendix J.II.H. Appendix J.II.H.1 states, "The containment isolation valves included are those that: provide a direct connection between the inside and outside atmosphere of the primary reactor containment under normal operation, such as purge and ventilation, vacuum relief, and instrument valves."

The basis for revision 11 of PT-20.3 was an evaluation of the latest listing of containment isolation valves with careful review of all NRC documents discussing containment isolation valves (CIVs) and the TMI Task Force study of CIVs. The base document which must be met in LLRT testing is 10CFR50, Appendix J, which was not directly addressed in the revision 11 safety analysis of PT-20.3. The acceptance of General Physics' recommendation to include these valves in the 1982 Unit No. 2 LLRT test negates this entire revision.

During this investigation, it was discovered that a revision to technical specifications had been written but never submitted to the NRC. This revision would have changed Section 3/4.6.3 and Table 3.6.3-1 to include all containment isolation valves and the appropriate Type C tests required for each valve. The identified reason for change on the revision form of revision 11 to PT-20.3 stated the change was made to reflect Technical Specification Section 3/4.6.3, Table 3.6.3-1, recently submitted to the NRC. It is believed that the referenced technical specification revision was never submitted; otherwise, revision 11 to PT-20.3 would have required a technical specification change to delete reference to the TIP ball valves which are

still included in Table 3.6.3-1 of BSEP technical specifications, yet were deleted from testing by revision 11 to PT-20.3. The reason for this confusion and other problems associated with LLRT testing appear to be at least in part due to the personnel transfers and departure of key personnel responsible for the program which detracted from continuity in the program.

When the valves were added to PT-20.3 in June 1982, it was not recognized by reviewing personnel that the valves being added created an LCO condition on Unit No. 1. Technical Specification Section 4.6.1.2, which defines LLRT testing, does not reference Table 3.6.3-1. A complete list of valves required for containment isolation valve testing included in technical specification and referenced in surveillance requirement 4.6.1.2 would have made this LCO condition obvious to the reviewers. It was recognized that the PT would have to be revised for both units and an effort was made to prepare a permanent revision to PT-20.3. The changes to Unit No. 2 LLRT testing were revised by temporary revisions in order to continue testing in accordance with plant procedures.

An additional problem noted during this investigation involves a technical specification requirement which deviates from specific 10CFR50, Appendix J, requirements. It is possible to meet the requirements of the plant technical specifications with regard to frequency of LLRT testing and to violate the requirements in 10CFR50. Technical specifications require LLRT testing to be performed at a periodicity not exceeding 24 months. 10CFR50, Appendix J, states "Type C tests shall be performed during each reactor shutdown for refueling, but in no case at intervals greater than two years."

The list of recommendations enclosed below are being reviewed and appropriate actions will be taken.

1. A list of containment isolation valves with the appropriate Type A, B, and C testing requirements will be included in BSEP technical specifications and referenced in Surveillance Requirement 4.6.1.2.
2. Since BSEP technical specifications can be met with regard to test frequency of LLRT while not meeting specific requirements stated in 10CFR50, Appendix J, technical specifications should be changed to agree with Appendix J requirements or assurances should be made that utilizing our present technical specification frequency does not constitute a violation of 10CFR50.
3. If our present technical specification requirement of testing every 24 months is shown to be acceptable, the start date of the PT should initiate the 24-month clock to the next required test.
4. Maintain continuity by establishing layered expertise in critical areas such that movement or departure of personnel does not leave a void.
5. The problem of nonrecognition of an LCO condition on Unit No. 1 when additional valves were added to Unit No. 2 LLRT tests should be resolved by incorporation of recommendation 1.

ATTACHMENT 1

Valves not included previously in PT-20.3.

CAC-PV1218-C

CAC-PV1221-C

CAC-PV1263-4

CAC-SV1263-3

CAC-SV1263-2

CAC-SV1263-1

1-CAC-SV1259-2

CAC-SV1259-4

CAC-SV1259-3

1-CAC-PV1260

2-CAC-SV1259-2

CAC-SV1259

ATTACHMENT 2

Valves deleted by revision 4 to PT-20.3.

E11-F037D

E11-F037B

E11-F043D

E11-F043B

E11-F037C

E11-F043C

E11-F043A

E11-F037A

E41-PV1219-D

E41-PV1218-D

E41-PV1220-D

E41-PV1221-D

CAC-PV1225-C

CAC-PV1219-B

CAC-PV1220-C

CAC-PV1219-C

CAC-PV1209-D

# ATTACHMENT 3

Valves deleted by revision 11 to PT-20.3.

E11-F025A	RNA-PV1204B	CAC-PV-1231B
E11-F025B	RNA-PV1204C	CAC-PV3440
E41-F075	TIP-V1	CAC-PV1225B
E41-F079	TIP-V2	CAC-PV1211F
E41-F021	TIP-V3	CAC-PV1262
E41-F049	TIP-V4	CAC-PV1209A
E41-F022	TIP N <sub>2</sub> check valve	CAC-PV1209B
E41-F040	TIP N <sub>2</sub> solenoid valve	CAC-PV1205E
E51-F002	CAC-1260	CAC-PV1215E
E51-F028	CAC-PV1200B	CAC-PV1211E
E51-F001	CAC-PV1261	CAC-PV3439
E51-F040	CAC-PV1227A	CAC-PV3441
E51-F062	CAC-PV1227B	CAC-PV3442
E51-F066	CAC-PV1227C	CAC-PV3437
RNA-V101	CAC-PV1227E	CAC-PV3438
RNA-V103	CAC-PV1260	