

The Light company

Houston Lighting & Power South Texas Project Electric Generating Station P. O. Box 289 Wadsworth, Texas 77483

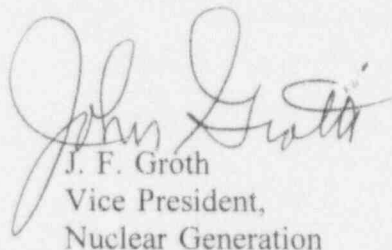
March 31, 1994
ST-HL-AE-4724
File No.: G.26
10CFR50.73

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

South Texas Project
Unit 1
Docket No. STN 50-498
Voluntary Licensee Event Report 94-004
Regarding Surveillance Testing of the Pressurizer Power Operated Relief Valves

Pursuant to 10CFR50.73, Houston Lighting & Power submits the attached Unit 1 Voluntary Licensee Event Report 94-004 regarding surveillance testing of the Pressurizer Power Operated Relief Valves. This event did not have an adverse effect on the health and safety of the public.

If you should have any questions on this matter, please contact Mr. J. M. Pinzon at (512) 972-8027 or me at (512) 972-8664.


J. F. Groth
Vice President,
Nuclear Generation

HRP/esh
Attachment: Voluntary LER 94-004 (South Texas, Unit 1)

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PDR ADDCK 05000498
S PDR

Handwritten initials and date:
JF 3/31/94

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LICENSEE EVENT REPORT (LER)

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

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.

FACILITY NAME (1)
South Texas Unit 1

DOCKET NUMBER (2)
05000 498

PAGE (3)
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TITLE (4) Voluntary LER regarding Surveillance Testing of the Pressurizer Power Operated Relief Valves.

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 NAME	DOCKET NUMBER
01	19	94	94	-- 004 --	00	03	31	94	South Texas UNIT 2	05000 499
									FACILITY NAME	DOCKET NUMBER

OPERATING MODE (9)	5	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more) (11)								
POWER LEVEL (10)	0	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)		<input checked="" type="checkbox"/> OTHER
		20.405(a)(1)(iii)			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)		VOLUNTARY

LICENSEE CONTACT FOR THIS LER (12)	
NAME Jairo Pinzon - Senior Engineer	TELEPHONE NUMBER (Include Area Code) (512) 972-8027

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).	<input checked="" type="checkbox"/>	NO					

ABSTRACT (Limit to 1400 spaces, i.e., approximately 15 single-spaced typewritten lines) (16)

On January 19, 1994, at 1700 hours, with Unit 1 in mode 5 and Unit 2 defueled while in a refueling outage, it was determined the surveillance performed to comply with Surveillance Requirement 4.4.4.1.b for Relief Valves needed to be enhanced because the pressurizer power operated relief valves were not tested from the Main Control Board.

Technical Specification testing requirements are captured in Surveillance Requirement 4.3.3.5.2 for the Remote Shutdown System and Surveillance Requirement 4.4.4.1 for relief valves. The requirements are addressed by performance of procedure 1(2)PSP03-RC-0010, Pressurizer Power Operated Relief Valve Operability Test. This is an 18 month cold shutdown test done in conformance with ASME Section XI and Technical Specification 4.0.5. It requires a stroke time test and remote verification. Historically the testing has been conducted only from the Auxiliary Shutdown Panel to meet both surveillance requirements.

Except for the Remote Shutdown System specification, the Technical Specifications do not specify from where the pressurizer power operated relief valves are to be tested, nor does the ASME Code. However, it is prudent to test the valves from both the Auxiliary Shutdown Panel and the Main Control Board. As part of the South Texas program to upgrade surveillance procedures, this requirement has been included.

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

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FACILITY NAME (1)		DOCKET NUMBER (2)		LER NUMBER (6)		PAGE (3)	
South Texas, Unit 1		05000 498		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	2 OF 4
				94	-- 004 --	00	

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

DESCRIPTION OF EVENT :

On January 19, 1994 at 1700 hours, the determination was made that the surveillance performed to comply with Surveillance Requirement 4.4.4.1.b for Relief Valves needed to be expanded to test valves from the Main Control Board.

During review of surveillance procedures 1(2)PSP03-RC-0010, Pressurizer Power Operated Relief Valve Operability Test, the NRC Operational Readiness Assessment Team identified a concern that the procedure only required testing the pressurizer Power Operated Relief Valves from the Auxiliary Shutdown Panel but not from the Main Control Board.

Procedures 1(2)PSP03-RC-0010, Pressurizer Power Operated Relief Valve Operational Test, test the pressurizer Power Operated Relief Valves from the Auxiliary Shutdown Panel to satisfy the surveillance requirements of Technical Specifications 4.0.5 for ASME testing, 4.4.4.1.b for Relief Valve operability, and 4.3.3.5.2 for Auxiliary Shutdown Panel remote valve operation. Technical Specification 4.4.4.1.b requires the pressurizer Power Operated Relief Valves be demonstrated operable by cycling the pressurizer Power Operated Relief Valves but does not specifically require valve testing from the Main Control Board. The ASME Code also does not specify the remote control location for component manipulation.

CAUSE OF EVENT:

The cause of this event was that neither Technical Specification 4.4.4.1.b nor the ASME Code specifically requires the pressurizer Power Operated Relief Valves be tested from the Control Room Main Control Board. It has been determined that it is prudent to test the pressurizer Power Operated Relief Valves from both locations. The previous surveillance performances fulfilled the requirements of Technical Specification 4.4.4.1.b to demonstrate the operability of the pressurizer Power Operated Relief Valves. Therefore this event represents a need to increase the effectiveness of the subject surveillance procedures.

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

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

ANALYSIS OF EVENT:

Manual operation of the pressurizer Power Operated Relief Valves from the Main Control Board is a safety-related function that may be used to mitigate the Steam Generator tube rupture accident. Assuming a loss of offsite power and a tube rupture, the pressurizer Power Operated Relief Valves may be required to be operable in the event they are needed in the depressurization of the Reactor Coolant System. A delay in depressurization of the Reactor Coolant System could result in overfilling the steam generators during recovery from a tube rupture event. The South Texas Project procedures are designed to prevent the overfill. However, if overfill were to occur, the main steam lines are designed to accommodate the additional mass of liquid. Consequently, the tube rupture would be successfully mitigated. After finding the valves not tested from the Control Room during the surveillance, HL&P subsequently tested them from that location. There is no reason to believe the Pressurizer Power Operated Valves were not operable previously.

The Technical Specification definition of operability states that all of the necessary attendant instrumentation, controls, and other auxiliary equipment required for the system, subsystem, train component or device to perform its function are also capable of performing their related support functions. The operability definition implies that the associated Control Room pressurizer Power Operated Relief Valve handswitch and control circuitry are required for operability.

Technical Specification 4.4.4.1.b requires the pressurizer Power Operated Relief Valves be demonstrated OPERABLE by cycling the pressurizer Power Operated Relief Valves, but does not specifically require valve testing from the Main Control Board. The ASME Code also does not specify the remote control location for component testing. The determination has been made that it is prudent to test the pressurizer Power Operated Relief Valves from both locations. The previous surveillance performances fulfilled the requirements of Technical Specification 4.4.4.1.b to demonstrate the operability of the pressurizer Power Operated Relief Valves. This event is considered not reportable pursuant to 10CFR50.72 and 10CFR50.73.

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

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

CORRECTIVE ACTIONS:

1. A review was performed to determine if any other components tested from the Auxiliary Shutdown Panel were also required to be tested from the Main Control Board. No other discrepancies were identified.
2. Procedure 1(2)PSP03-RC-0010, Pressurizer Power Operated Relief Valve Operability Test, has been replaced with 0PSP03-RC-0010, Pressurizer Power Operated Relief Valve Remote Location Operability Test, to test the Pressurizer Power Operated Relief Valves from the Auxiliary Shutdown Panel. 0PSP03-RC-0012, Pressurizer Power Operated Relief Valve Operability Test, has been developed and implemented to test the Pressurizer Power Operated Relief Valves from the Main Control Board.