



PEACH BOTTOM—THE POWER OF EXCELLENCE

**PHILADELPHIA ELECTRIC COMPANY**

PEACH BOTTOM ATOMIC POWER STATION

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Delta, Pennsylvania 17314

(717) 456-7014

October 18, 1990

Docket No. 50-277

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

SUBJECT: Licensee Event Report  
Peach Bottom Atomic Power Station - Unit 2

This LER concerns a missed Technical Specification surveillance on a Drywell - Suppression Chamber Vacuum Breaker.

Reference:	Docket No. 50-277
Report Number:	2-90-028
Revision Number:	00
Event Date:	08/01/90
Discovery Date:	09/19/90
Report Date:	10/18/90
Facility:	Peach Bottom Atomic Power Station RD 1, Box 208, Delta, PA 17314

This LER is being submitted pursuant to the requirements of 10 CFR 50.73(a)(2)(i)(B).

Sincerely,

cc: J. J. Lyash, USNRC Senior Resident Inspector  
T. T. Martin, USNRC, Region I

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LICENSEE EVENT REPORT (LER)

FACILITY NAME (1) Peach Bottom Atomic Power Station - Unit 2	DOCKET NUMBER (2) 0 5 0 0 0 2 7 7	PAGE (3) 1 CF 0 3
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TITLE (4) Missed Surveillance on a Drywell-Suppression Chamber Vacuum Breaker due to an Improper use of a Partial Procedure

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 NAMES		DOCKET NUMBER(S)
08	01	90	90	028	00	01	01	89			0 5 0 0 0
0 5 0 0 0											

OPERATING MODE (9) N	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR § (Check one or more of the following) (11)										
POWER LEVEL (10) 1 0 0	<input type="checkbox"/> 20.40(a)(b)	<input type="checkbox"/> 20.405(c)	<input type="checkbox"/> 50.73(a)(2)(iv)	<input type="checkbox"/> 73.71(b)							
	<input type="checkbox"/> 20.405(a)(1)(i)	<input type="checkbox"/> 50.36(c)(1)	<input type="checkbox"/> 50.73(a)(2)(v)	<input type="checkbox"/> 73.71(c)							
	<input type="checkbox"/> 20.405(a)(1)(ii)	<input type="checkbox"/> 50.36(c)(2)	<input type="checkbox"/> 50.73(a)(2)(vi)	OTHER (Specify in Abstract below and in Text, NRC Form 366A)							
	<input type="checkbox"/> 20.405(a)(1)(iii)	<input checked="" type="checkbox"/> 50.73(a)(2)(i)	<input type="checkbox"/> 50.73(a)(2)(vii)(A)								
	<input type="checkbox"/> 20.405(a)(1)(iv)	<input type="checkbox"/> 50.73(a)(2)(ii)	<input type="checkbox"/> 50.73(a)(2)(vii)(B)								
<input type="checkbox"/> 20.405(a)(1)(v)	<input type="checkbox"/> 50.73(a)(2)(iii)	<input type="checkbox"/> 50.73(a)(2)(x)									

LICENSEE CONTACT FOR THIS LER (12)									
NAME A. A. Fulvio - Regulatory Engineer							TELEPHONE NUMBER 7 1 7 4 5 6 1 - 7 0 1 4		

COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPROS	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPROS

SUPPLEMENTAL REPORT EXPECTED (14)							EXPECTED SUBMISSION DATE (15)		
<input type="checkbox"/> YES (If yes, complete EXPECTED SUBMISSION DATE) <input checked="" type="checkbox"/> NO									

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

While reviewing a completed procedure on 9/19/90, it was discovered that a Drywell-Suppression Chamber Vacuum Breaker had not been exercised as required by Technical Specifications. In preparation for performing the valve exercise testing on 7/11/90, the Shift Supervisor directed that a partial test be performed. The "C" vacuum breaker was excluded from being exercised because it was thought to be inoperable. The cause of the event was an improper use of a partial procedure. There were no safety consequences as a result of this event. It was proven during the following scheduled surveillance performance that the vacuum breaker was capable of performing its intended safety function. An entry was made in the LCO log stating that the "C" vacuum breaker should be exercised monthly in addition to bypass area testing which was being performed because the vacuum breaker would not indicate fully seated. The individual involved has been informed of this event. The pertinent information contained in this report will be included in required reading for appropriate Operations personnel. No previous similar LERs were identified.

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

FACILITY NAME (1) Peach Bottom Atomic Power Station - Unit 2	DOCKET NUMBER (2) 0   5   0   0   0   2   7   7	LER NUMBER (6)			PAGE (3)	
		YEAR 9   0	SEQUENTIAL NUMBER -   0   2   8	REVISION NUMBER -   0   0	0   2	OF 0   3

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

Requirements for the Report

This report is required per 10 CFR 50.73 (a)(2)(i)(B) due to a surveillance not being performed when required by Technical Specifications (Tech Specs).

Unit Conditions at Time of Event (8/1/90)

Unit 2 was in the RUN mode at 100% of rated thermal reactor (EIIS:RPV) power.

There were no systems, structures, or components that were inoperable that contributed to this event.

Description of Event

On 9/19/90, during a review of a completed procedure, a system engineer discovered that a Drywell-Suppression Chamber Vacuum Breaker (EIIS:VACB) was not exercised as required by Tech Spec surveillance requirements on 7/11/90. Tech Spec 4.7.A.4.a requires that operable vacuum breakers be exercised through an opening-closing cycle once per month. The vacuum breakers are required to equalize pressure between the Drywell (EIIS:NH) and Suppression Chamber (EIIS:BT) during design basis events. In combination with the Suppression Chamber-Secondary Containment Vacuum Breakers, the vacuum breakers limit the negative pressure differential between the Drywell and Secondary Containment (EIIS:NG) to below design limits.

During the 7/11/90 performance of this surveillance, the "C" vacuum breaker exercise portion of the surveillance test (ST) 9.6, "Drywell-Torus Vacuum Breakers", was not performed. During subsequent performances of ST 9.6 on 8/8/90, 8/22/90, and 9/19/90, the "C" vacuum breaker was exercised as required. The late grace surveillance period for the 7/11/90 test expired on 8/1/90.

Cause of Event

The cause of not performing the "C" vacuum breaker portion of ST 9.6 on 7/11/90 is due to an improper use of a partial procedure by an Operations Shift Supervisor (Utility, Licensed). The station administrative procedure on temporary changes to procedures allows partial procedure use in some circumstances when it is necessary or prudent to perform only parts of a test. In preparation of the test in July, the Shift Supervisor believed that the "C" vacuum breaker was inoperable and therefore authorized that a partial test be performed excluding the "C" vacuum breaker. The "C" vacuum breaker had been previously entered into the Limiting Conditions for Operation (LCO) log due to the 6/13/90 performance of ST 9.6. This was because the "C" vacuum breaker failed to indicate a fully seated position although it exercised properly during the test. This entry in the LCO log was made to ensure that Tech Spec 3.7.A.4.b would be satisfied but not to indicate that the vacuum breaker was inoperable for opening. In the event of a vacuum breaker failure to provide a fully seated indication, Tech Spec 3.7.A.4.b requires that in addition to monthly exercising of the vacuum breaker, bypass testing be performed periodically to verify that there exists less than an equivalent one inch diameter hole bypass between the Drywell and Suppression Chamber.

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

FACILITY NAME (1) Peach Bottom Atomic Power Station - Unit 2	DOCKET NUMBER (2) 0   5   0   0   0   2   7   7	LER NUMBER (6)			PAGE (3)	
		YEAR 90	SEQUENTIAL NUMBER 028	REVISION NUMBER 00	03	OF

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

During the time of the 7/11/90 test performance, the Unit 3 "M" Drywell-Suppression Chamber Vacuum Breaker was inoperable for opening and entered into the Unit 3 LCO log. This may have been a contributing factor in the incorrect belief that the Unit 2 "C" vacuum breaker was inoperable.

Analysis of the Event

There were no safety consequences as a result of this event. Although exercising of the "C" vacuum breaker was not performed on 7/11/90, subsequent performances of ST 9.6 proved that the "C" vacuum breaker was operable for opening during this time. In addition, Tech Specs and the Updated Final Safety Analysis Report (UFSAR) allow for two of the twelve Drywell-Suppression chamber vacuum breakers to be inoperable for opening without compromising the safety function of the vacuum breakers. Thus, if the vacuum breaker had failed to open, eleven vacuum breakers were still available to perform the safety function. Bypass testing that was initiated as a result of the "C" vacuum breaker not indicating fully seated proved that less than an equivalent one inch diameter hole existed between the Drywell and the Suppression chamber.

Corrective Actions

An entry was made in the LCO log stating that the "C" vacuum breaker should be exercised monthly in addition to the bypass area testing. The individual involved has been informed of this event. The event appears to be isolated; however, the pertinent information contained in this report will be included in required reading for appropriate Operations personnel.

Previous Similar Events

No previous similar LERs were identified which involved a surveillance not being performed when required by Technical Specifications due to the improper use of partial testing.