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February 14, 1991

ELV-02529  
0840

Docket Nos. 50-424  
50-425

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

Gentlemen:

VOGTLE ELECTRIC GENERATING PLANT  
LICENSEE EVENT REPORT  
PROCEDURE PERFORMANCE RESULTS IN  
TECHNICAL SPECIFICATION VIOLATION

In accordance with 10 CFR 50.73, Georgia Power Company hereby submits the enclosed report related to an event which was determined to be reportable on January 22, 1991.

Sincerely,

*W. G. Hairston, III* FOR  
W. G. Hairston, III

WGH, III/NJS/gm

Enclosure: LER 50-424/1990-024

xc: Georgia Power Company  
Mr. C. K. McCoy  
Mr. W. B. Shipman  
Mr. P. D. Rushton  
Mr. R. M. Odom  
NURMS

U. S. Nuclear Regulatory Commission  
Mr. S. D. Ebnetter, Regional Administrator  
Mr. D. S. Hood, Licensing Project Manager, NRR  
Mr. B. R. Bonser, Senior Resident Inspector, Vogtle

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PDR ADOCK 05000424  
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*11*

LICENSEE EVENT REPORT (LER)

FACILITY NAME (1) VEGTELE ELECTRIC GENERATING PLANT - UNIT 1	DOCKET NUMBER (2) 05000424	PAGE (3) 1 OF 4
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TITLE (4)  
PROCEDURE PERFORMANCE RESULTS IN TECHNICAL SPECIFICATION VIOLATION

EVENT DATE (5)			LER NUMBER (6)			REPORT DATE (7)			OTHER FACILITIES INVOLVED (8)	
MONTH	DAY	YEAR	YEAR	SEQ NUM	REV	MONTH	DAY	YEAR	FACILITY NAMES	DOCKET NUMBER(S)
08	07	90	90	024	00	02	14	91	VEGP - UNIT 2	05000425
										05000

THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR (11)

OPERATING MODE (9) 1	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)(vi)	OTHER (Specify in Abstract below)
	20.405(a)(1)(iii)	50.73(a)(2)(i)	50.73(a)(2)(vii)(A)	
	20.405(a)(1)(iv)	50.73(a)(2)(ii)	50.73(a)(2)(vii)(B)	
POWER LEVEL 100	20.405(a)(1)(v)	50.73(a)(2)(iii)	50.73(a)(2)(x)	

LICENSEE CONTACT FOR THIS LER (12)

NAME	TELEPHONE NUMBER	
	AREA CODE	NUMBER
R. M. ODOM, NUCLEAR SAFETY AND COMPLIANCE	404	826-3201

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

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORT TO NRPDS	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORT TO NRPDS

SUPPLEMENTAL REPORT EXPECTED (14)

<input type="checkbox"/> YES (if yes, complete EXPECTED SUBMISSION DATE)	<input checked="" type="checkbox"/> NO	EXPECTED SUBMISSION DATE (15)	MONTH	DAY	YEAR

ABSTRACT (16)

On 8-6-90, Containment Isolation Valves (CIVs) associated with Train A of the Unit 2 Hydrogen Monitoring System were opened to allow the performance of surveillance testing. On 8-7-90, after completion of testing, the Unit 2 CIVs were closed and the Unit 1 CIVs were opened for similar testing on Unit 1. After a discussion between NRC inspectors and the Unit Shift Supervisor (USS) regarding the appropriateness of opening these valves, the CIVs were closed and the test terminated. On 1-22-91, after reviewing NRC violations 50-424/1990-19-02 and 50-425/1990-19-02 regarding these events, plant personnel concurred that opening the CIVs resulted in a condition prohibited by the Technical Specifications. The valves were open and, thus, inoperable and the action requirements of TS 3.6.3 and 3.0.3 were not implemented.

The cause of these events was procedural inadequacy because the procedures involved allowed the CIVs to be opened for surveillance testing. Each Department Procedure Coordinator has been briefed regarding the importance of obtaining proper reviews and the appropriate procedures have been revised to preclude further violations.

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TEXT

**A. REQUIREMENT FOR REPORT**

This report is required per 10 CFR 50.73 (a)(2)(i) because the Technical Specifications (TS) were violated. Action statement requirements were not complied with upon opening of certain Containment Isolation Valves (CIVs). Operability of the CIVs is governed by TS 3.6.3.

**B. UNIT STATUS AT TIME OF EVENTS**

At the time of these events, Unit 1 was in Mode 1 (Power Operation) at 100% of rated thermal power (RTP). Unit 2 was in Mode 1 at 63% RTP. Other than that described herein, there was no inoperable equipment which contributed to the occurrence of these events.

**C. DESCRIPTION OF EVENTS**

On 8-6-90, NRC inspectors were monitoring control room operations and observed that CIVs associated with Train A of the Unit 2 Hydrogen Monitoring System were open. These valves, 2HV-2792A, 2HV-2792B, 2HV-2791B and 2HV-2793B, are remotely-operated valves designated as CIVs in the FSAR and not normally open during power operation. However, the post-accident position of these valves is "open." The Unit Shift Supervisor (USS) advised the inspectors that the CIVs were open to allow the performance of procedure 24551-2, "Containment Hydrogen Monitor Train A Analog Channel Operational Test And Channel Calibration." The Unit 2 CIVs were opened for surveillance testing at 0411 CST on 8-6-90.

At 0122 CST on 8-7-90, after completion of testing, the Unit 2 CIVs were closed and at 0206 CST, the Unit 1 CIVs were opened for similar testing on Unit 1. After a discussion between the inspectors and the USS, the CIVs were closed and the test terminated at 2053 CST.

On 1-22-91, after reviewing NRC violations 50-424/1990-19-02 and 50-425/1990-19-02 regarding these events, plant personnel concurred that opening the CIVs resulted in a condition prohibited by the TS. The required action of TS 3.6.3, in the event of one or more inoperable CIVs, is to maintain at least one CIV operable in each affected penetration and, within 4 hours, to restore the inoperable valve(s), or isolate the affected penetration, or shut the plant down. The subject valves were open and, thus, inoperable for more than 4 hours, and, since there were no operable valves for the subject penetrations, these events represent entry into TS 3.0.3.

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A review found that this condition existed on a twice-a-month basis in each unit whenever procedures 24551-1 & 2 or procedures 24552-1 & 2, "Containment Hydrogen Monitor Train B Analog Channel Operational Test And Channel Calibration," were performed as needed to comply with TS surveillance requirements. This condition also occurred on an approximately monthly basis when post-accident sampling system (PASS) samples were taken per procedure 35611-C, "Remote Operation Of The Post Accident Sampling System," or per procedure 35614-C, "Local Operation Of The Post Accident Sampling System." This condition may also have existed when quarterly inservice valve testing was performed per procedures 14830-1 & 2, "Quarterly Check Valve Inservice Test."

## D. CAUSE OF EVENTS

The cause of these events was procedural inadequacy, specifically procedures 24551-1 and 2, procedures 24552-1 and 2, procedures 14830-1 and 2, and procedures 35611-C and 35614-C. These faulty procedures directed the valves to be opened for either surveillance testing or sampling. Contributing to this was a lack of proper procedure review.

Also contributing to this procedural inadequacy was the perception that these CIVs received an automatic isolation signal and that the hydrogen monitors represented an extension of the containment boundary because the hydrogen monitor system is designed to withstand full containment design pressure.

## E. ANALYSIS OF EVENTS

The penetrations and the associated system have been demonstrated to be capable of withstanding full containment design pressure. Additionally, these penetrations are subject to regular leakage assessment. Based on these considerations, there was no adverse impact to plant safety or to the health and safety of the public as a result of these events.

## F. CORRECTIVE ACTIONS

1. Procedures 24551-1 & 2 and 24552-1 & 2 have been revised to eliminate the need to open the subject valves during testing. Procedures 14830-1 & 2 have been revised to ensure the appropriate TS action statement is entered when the subject valves are open.
2. Procedures 35611-C and 35614-C will be revised by 3-5-91 to ensure that these valves are not opened in Modes 1-4 since doing so would constitute an entry into TS 3.0.3.
3. Each Department Procedure Coordinator has been briefed regarding the importance of obtaining proper reviews.

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TEXT

4. Georgia Power Company (GPC) intends to pursue a future licensing document change (e.g., TS amendment or FSAR revision) which will allow the subject CIVs to be opened periodically under administrative control.

G. ADDITIONAL INFORMATION

1. Failed Components:  
None

2. Previous Similar Events:  
None

3. Energy Industry Identification System Code:  
Hydrogen Monitoring System - BB  
Containment Isolation System - JM