NRC FORM 366 (12-81)

U.S. NUCLEAR REGULATORY COMMISSION

LICENSEE EVENT REPORT

APPROVED BY OMB 3150-0011 EXPIRES 4-30-82

CONTROL BLOCK: (1) (PLEASE PRINT OR TYPE ALL REQUIRED INFORMATION)

(2) LICENSEE CODE: PASES1 | (3) LICENSE NUMBER: 00-00000-00 | (4) LICENSE TYPE: 4 1 1 1 1 | (5) CAT:

CON'T

REPORT SOURCE: L (6) | DOCKET NUMBER: 0 5 0 0 0 3 8 7 (7) | EVENT DATE: 1 0 3 0 8 2 (8) | REPORT DATE: 1 1 1 2 8 2 (9)

EVENT DESCRIPTION AND PROBABLE CONSEQUENCES (10)

During a startup testing outage, it was determined that the number of cycles allowed (10) per the SER, for the Reactor Recirculation Pump Discharge Values were exceeded. The SER commitment was referenced in the Operating License, this is reportable per O.L. item 2.G(a). The values have been qualified for 25 cycles, therefore, no adverse consequences existed.

SYSTEM CODE (11)	CAUSE CODE (12)	CAUSE SUBCODE (13)	COMPONENT CODE (14)	COMP. SUBCODE (15)	VALVE SUBCODE (16)
CB	X	Z	VALVOP	A	Z

(17) LER/RO REPORT NUMBER: EVENT YEAR 8 2 — SEQUENTIAL REPORT NO. 0 3 7 — OCCURRENCE CODE / 0 1 — REPORT TYPE T — REVISION NO. —/0

ACTION TAKEN (18)	FUTURE ACTION (19)	EFFECT ON PLANT (20)	SHUTDOWN METHOD (21)	HOURS (22)	ATTACHMENT SUBMITTED (23)	NPRD-4 FORM SUB. (24)	PRIME COMP. SUPPLIER (25)	COMPONENT MANUFACTURER (26)
X	Z	Z	Z	0000	Y	N		

CAUSE DESCRIPTION AND CORRECTIVE ACTIONS (27)

Original indication received informally from the NRC indicated that no O.L. change was needed to raise the valve operating limits from 10 to 25 times. After the limit was internally changed and the valves operated more than 10 times, the NRC stated an O.L. change was needed and the unit was in violation of the license.

FACILITY STATUS: B (28) | % POWER: 000 (29) | OTHER STATUS (30): n/a | METHOD OF DISCOVERY: L (31) | DISCOVERY DESCRIPTION (32): operator observation

ACTIVITY RELEASED: Z (33) | CONTENT OF RELEASE: Z (34) | AMOUNT OF ACTIVITY (35): n/a | LOCATION OF RELEASE (36): n/a

PERSONNEL EXPOSURES: NUMBER 000 (37) | TYPE Z (38) | DESCRIPTION (39): n/a

PERSONNEL INJURIES: NUMBER 000 (40) | DESCRIPTION (41): n/a

LOSS OF OR DAMAGE TO FACILITY: TYPE Z (42) | DESCRIPTION (43): n/a

PUBLICITY: ISSUED N (44) | DESCRIPTION (45):

8211290751 821112
PDR ADOCK 05000387
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NRC USE ONLY

NAME OF PREPARER D.G. Mitchell PHONE: (717) 542-2181 X524

Attachment

Licensee Event Report 82-037/01T-0

SUBJECT: Reactor Recirculation Pump Discharge Valve Cycles

DESCRIPTION:

License Condition C(23) (b) specifies that all actions relating to seismic and dynamic qualification of equipment shall be completed as specified in Section 3.10 of Supplement No. 3 of the SER. Section 3.10.2(5) of Supplement No. 3 identifies the Reactor Recirculation Pump discharge valves (HV-1F031 A and B) as being not fully qualified. Since dynamic qualification testing of the Limitorque SMB-3 operators for these valves was performed without electric motor brakes installed, the brakes had to be removed to provide qualified components. However, the supplier of these components imposed a limit of 10 operational cycles after the brakes were removed and the valves set up for position seating operation. This limit was intended to assure that no seat damage occurs as a result of valve operation that will impact the safety function.

A review of the valve closure log maintained in accordance with OI-64-001 on November 1, 1982 revealed that HV-1F031B had been cycled for the eleventh time on October 30, 1982.

CAUSE:

While the plant was shut down for the October outage, it was recognized that HV-1F031B was at its limit of 10 cycles and that HV-1F031A had completed 8 cycles. Efforts were initiated to resolve this operating restraint along parallel paths. Utilizing information supplied from GE justifying continued operation for up to 25 valve cycles, Nuclear Licensing addressed obtaining any necessary NRC approvals. The proposed change to a 25 cycle limit was informally discussed and accepted by the technical reviewer, and Nuclear Licensing submitted a request (PLA-1365, dated 10/27/82)for a revision to SER Supplement No. 3. NRR replied informally that since no limit or schedule was actually included in the License Condition, no revision to the SER and no License change was required and that the change could be made upon completion of a Safety Evaluation. Since a PMR had already been reviewed by PORC (PMR 82-353) incorporating the 25 cycle limit (reference to FDDR KRI-380 Rev. 1), all actions identified by NRR were completed and the operational cycle limit was raised to 25. On November 1, 1982, NRR informed PP&L that a license change was required to permit a change to the 25 cycle limit.

ANALYSIS OF SAFETY IMPLICATIONS:

The cycle limit (10 or 25) is imposed to assure that the LPCI injection flowpath is not degraded due to leakage past the discharge valve caused by seat damage. The 25 cycle limit was incorporated in FDDR KRI-380 Rev. 1, which provided the basis for the PMR to replace the operators. This position was confirmed in an L.C. Brun (Lunkenheimer Co.) to R. Moyer (PP&L) letter dated 10/27/82, and in a GE to PP&L letter (GP 82-268). Additionally, the GE letter stated that even if seat damage were to occur, up to 30% of RHR flow could be bypassed without causing Appendix K limits to be exceeded.

Based on the above referenced evaluations, continued operation of the plant with the existing motor operators is justified up to a limit of 25 cycles. Prior to exceeding that limit, the operators will require replacement.

CORRECTIVE ACTION:

A license change is required to accept operation up to a 25 cycle limit. Nuclear Licensing is preparing the change request, to be submitted prior to 11/11/82. The plant staff will schedule replacement of the motor operators prior to exceeding 25 cycles.

No programmatic breakdown was identified as a cause of this incident, therefore no changes are required to prevent recurrence.

DGM/cw