Entergy Operations

Entergy Operations, Inc.
PO Box B
Killona, LA 70066
Tel 504-739-6660

Ref: 10CFR50.73(a)(2)(i)

W3B5-91-0001
A4.05
QA

January 7, 1991

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

Subject: Waterford 3 SES
Docket No. 50-382
License No. NPF-38
Reporting of Licensee Event Report

Gentlemen:

Attached is Licensee Event Report Number LER-90-018-00 for Waterford Steam Electric Station Unit 3. This Licensee Event Report is submitted pursuant to 10CFR50.73(a)(2)(i).

Very truly yours,

J.R. McGaha
General Manager - Plant Operations

JRM/JEF/rk
Attachment

cc: Messrs. R.D. Martin
G.L. Florreich
J.T. Wheelock - INPO Records Center
E.L. Blake
D.L. Wigginton
NRC Resident Inspectors Office

IE22
1/1

NRC FORM 366 (6-89) U.S. NUCLEAR REGULATORY COMMISSION

LICENSEE EVENT REPORT (LER)

APPROVED OMB NO. 3150-0104
EXPIRES: 4/30/92

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 50.0 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE RECORDS AND REPORTS MANAGEMENT BRANCH (P-530), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

FACILITY NAME (1)	DOCKET NUMBER (2)	PAGE (3)
Waterford Steam Electric Station Unit 3	0 5 0 0 0 3 8 2	1 OF 0 4

TITLE (4): Low Temperature Overpressure Protection Verification Not Performed Per Technical Specifications

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)
											N/A	0 5 0 0 0
1 2	1 8	8 4	9 0	-	0 1 8	-	0 0	0 1	0 7	9 1	N/A	0 5 0 0 0

OPERATING MODE (9)		THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more of the following) (11)			
1		20.402(b)	20.405(c)	50.73(a)(2)(iv)	73.71(b)
POWER LEVEL (10)		20.405(a)(1)(i)	50.36(c)(1)	50.73(a)(2)(v)	73.71(c)
1 0 0		20.405(a)(1)(ii)	50.36(c)(2)	50.73(a)(2)(vii)	OTHER (Specify in Abstract below and in Text, NRC Form 366A)
		20.405(a)(1)(iii)	X 50.73(a)(2)(i)	50.73(a)(2)(viii)(A)	
		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)	

LICENSEE CONTACT FOR THIS LER (12)

NAME	TELEPHONE NUMBER
	AREA CODE
L.W. Laughlin, Licensing Manager	5 0 4 7 3 9 - 6 7 2 6

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)	X NO				

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

On December 6, 1990, a review of Technical Specification (TS) revealed the verification of low temperature overpressure protection could not be performed as written. The overpressure protection, required when reactor coolant system (RCS) temperature is </= 285° with the reactor vessel head installed, is provided by the shutdown cooling system (SDCS) suction line relief valves, SI-406A and B. TS 4.4.8.3.1 requires each valve between the RCS and the suction relief valves be periodically verified "key-locked open." Since the SDCS suction line isolation valves are not designed to be "key-locked open," the relief valves were not demonstrated operable per TSs.

A TS change request to eliminate the words "key-locked" is being submitted. Since low temperature overpressure protection was not lost due to isolating the SDCS suction line and the relief valve isolation valves were verified "open" when required to be, no threat to the health or safety of the public or plant personnel existed.

APPROVED OMB NO. 3150-0104
EXPIRES: 4/30/92
ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 50.0 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE RECORDS AND REPORTS MANAGEMENT BRANCH (P-530), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)			PAGE (3)
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	
Waterford Steam Electric Station Unit 3	0 5 0 0 0 3 8 2	9 0	0 1 8	0 0	0 2 OF 0 4

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

On December 6, 1990, with Waterford Steam and Electric Station Unit 3 operating at 100% power, a review of Technical Specifications (TS) revealed the verification of low temperature overpressure protection could not be performed as written. The overpressure protection, required when reactor coolant system (RCS) (EIIS Identifier AB) temperature is </= 285° with the reactor vessel head (EIIS Identifier AB-RPV) installed, is provided by the shutdown cooling system (SDCS) suction line relief valves (EIIS Identifier BP-RV), SI-406A and B, which are aligned to the RCS. To ensure these relief valves are aligned to provide the overpressure protection, each valve in the suction line path between the RCS and SI-406 A and B is required to be verified "key-locked open" at least once per twelve hours by TS 4.4.8.3.1. However, SDCS suction isolation valves (EIIS Identifier BP-ISV), SI-401 A and B and SI-405 A and B, are not designed to be "key-locked open." Therefore, the SDCS suction line relief valves were not demonstrated operable as per TSs since issuance of the operating license on December 18, 1984.

The SDCS suction isolation valves have key operated handswitches that are designed to be "key-locked shut" to ensure the relief valves remain isolated during normal plant operation to prevent overpressurizing the SDCS. This plant configuration was apparently overlooked when the TS requirement was written, resulting in an operational requirement contrary to system design. The TS surveillance to verify the SDCS suction isolation valves "key-locked open" at least once per twelve hours was included in the "TS Surveillance Logs", Operating Procedure (OP) 903-001 which required SI-401 A and B and SI-405 A and B to be verified "locked open" once per shift. Administrative procedure "Control of Valves and Breakers", OP-100-009 defines "locked open" for key operated handswitch valves as having the switch position maintained in the open position after key removal. The design of the SI-401 A and B SI-405 A and B switches does not allow removal of the key in the open position. Operations personnel had been incorrectly verifying the valve "key-locked open" with the key installed.

A TS change request to eliminate the words "key locked" from TS 4.4.8.3.1 will be submitted for approval prior to March 1, 1991. Waterford 3 safety analyses do not take credit for locked open SDCS relief isolation valves; therefore, continuing to verify valve position "open" via OP-903-001 will maintain the high degree of confidence in system reliability without unnecessarily modifying system design. Surveillance procedure OP-903-001 is being reviewed for additional TS inconsistencies and will be revised upon completion of this review. Training will be conducted by operations department personnel on administrative procedure, OP-100-009, to clarify the meaning of "locked open" relative to valve or breaker positions in system alignments. The necessary procedure revisions and training is expected to be completed by January 31, 1991.

Since low temperature overpressure protection was not lost due to isolating the SDCS suction line and the relief valve isolation valves had been verified open when required, no threat to the health or safety of the public or plant personnel existed.

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)			PAGE (3)
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	
Waterford Steam Electric Station Unit 3	0 5 0 0 0 3 8 2	9 0	— 0 1 8	— 0 0	0 4 OF 0 4

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

Similar Events

None

Plant Contact

L.W. Laughlin, Licensing Manager, 504/739-6726.