



Commonwealth Edison
LaSalle County Nuclear Station
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Marseilles, Illinois 61341
Telephone 815/357-6761

January 7, 1991

Director of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Mail Station P1-137
Washington, D.C. 20555

Dear Sir:

Licensee Event Report #90-013-00, Docket #050-373 is being submitted to your office in accordance with 10CFR50.73(a)(2)(i).

for G. J. Diederich
Station Manager
LaSalle County Station

GJD/DCU/mkl

Enclosure

xc: Nuclear Licensing Administrator
NRC Resident Inspector
NRC Region III Administrator
INPO - Records Center

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LICENSEE EVENT REPORT (LER)

Form Rev 2.0

Facility Name (1) LaSalle County Station Unit 1
 Docket Number (2) 0 | 5 | 0 | 0 | 0 | 3 | 7 | 3
 Page (3) 1 | of | 0 | 4

Title (4)
 Missed Inservice Testing Surveillance On Residual Heat Removal Heat Exchanger Vent Valves Due To Procedural Deficiency Caused By Incomplete Review

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)					
1	2	0	7	9	0	9	0	0	1	0	7	9	1	LaSalle Unit 2	0 5 0 0 0 3 7 4

OPERATING MODE (9) 1

POWER LEVEL (10) 0 | 9 | 9

THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10CFR (Check one or more of the following) (11)

<input type="checkbox"/> 20.402(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)(vii)	<input type="checkbox"/> Other (Specify in Abstract below and in Text)
<input type="checkbox"/> 20.405(a)(1)(iii)	<input checked="" type="checkbox"/> 50.73(a)(2)(i)	<input type="checkbox"/> 50.73(a)(2)(viii)(A)	
<input type="checkbox"/> 20.405(a)(1)(iv)	<input type="checkbox"/> 50.73(a)(2)(ii)	<input type="checkbox"/> 50.73(a)(2)(viii)(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: David C. Uherek (IST/CV Coordinator) Extension 2323
 TELEPHONE NUMBER: AREA CODE 8 | 1 | 5 | 3 | 5 | 7 | - | 6 | 7 | 6 | 1

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

CAUSE	SYSTEM	COMPONENT	MANUFAC-TURER	REPORTABLE TO NPROS	CAUSE	SYSTEM	COMPONENT	MANUFAC-TURER	REPORTABLE TO NPROS
A	B	0		N					
D	B	0		N					

SUPPLEMENTAL REPORT EXPECTED (14)

Expected Submission Date (15) _____
 Yes (IF yes, complete EXPECTED SUBMISSION DATE) NO

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

On December 7, 1990 at 1500 hours with Unit 1 and Unit 2 in the Run Mode (Operational Condition 1) during the Inservice Testing (IST) annual review, the IST Coordinator found that eight (8) valves had been left out of LaSalle Operating Surveillance LOS-RH-Q2 "Residual Heat Removal (RHR) and RHR Service Water (SW) Valve Inservice Test For Operating Conditions 1, 2, and 3." The valves identified were 1(2)E12-F073A/B and 1(2)E12-F074A/B (RHR Heat Exchanger Vent Valves). These valves required quarterly stroke time testing due to the recent IST Program revision. The IST Program underwent a major revision to comply with General Letter 89-04 (Guidance on Developing Acceptable Inservice Testing Programs) which was issued by the Nuclear Regulatory Commission. The RHR heat exchanger vent valves were added to the IST Program; however, they were not placed into LOS-RH-Q2 which allows for quarterly stroke timing of various code valves.

The Shift Engineer was immediately notified of the procedural deficiency. On December 7, 1990 at approximately 1600 hours, the applicable valves were stroke timed satisfactorily with no valve degradation observed.

LOS-RH-Q2 will be revised to include these valves in quarterly stroke time testing. No other program discrepancies have been noted. This event is being reported pursuant to 10CFR50.73(a)(2)(i) due to missing a Technical Specification Surveillance.

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

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TEXT Energy Industry Identification System (EIIIS) codes are identified in the text as [XX]

PLANT AND SYSTEM IDENTIFICATION

General Electric - Boiling Water Reactor

Energy Industry Identification System (EIIIS) codes are identified in the text as [XX].

A. CONDITION PRIOR TO EVENT

Unit(s): 1/2 Event Date: 12/07/90 Event Time: 1500 Hours

Reactor Mode(s): 1 Mode(s) Name: Run Power Level(s): 99%/96%

B. DESCRIPTION OF EVENT

On December 7, 1990 during the performance of the annual Inservice Testing (IST) program review specified by LaSalle Technical Procedure, LTP-600-04, the IST Coordinator discovered eight (8) valves which were excluded from LaSalle Operating Surveillance LOS-RH-Q2, "Residual Heat Removal (RHR) [BO] and RHR Service Water (SW) [B1] Valve Inservice Test for Operating Conditions 1, 2, and 3". The valves identified were 1(2)E12-F073A/B and 1(2)E12-F074A/B (RHR Heat Exchanger Vent Valves. This procedure is used for RHR valves which may be cycled during operation. These valves were included in LOS-RH-Q3 "RHR and RHR SW Valve Inservice Test for Cold Shutdown and Refuel Conditions." This procedure is used for valves which may be cycled during cold shutdown or refueling.

Below is a list of conditions/events which lead to the deficient procedure:

A draft of Generic Letter 89-04 (Guidance on Developing Acceptable Inservice Testing Programs) was published on August 31, 1988. This consisted of 11 NRC positions expounding upon current IST concerns within the nuclear industry.

On April 13, 1989, Generic Letter 89-04 was issued to LaSalle Station requiring the stations response to the positions within the generic letter. LaSalle Station was required to perform a major IST revision in order to comply with the methodology delineated by the generic letter. The IST Program was revised to conform with the generic letter and submitted to the NRC in October 1989. The due date established for complete procedural implementation was February 2, 1990. Approximately 40 procedures were revised to reflect the changes of the IST Program.

Position 11 of the generic letter required LaSalle Station to review the scope of the IST program. The purpose was to ensure the inclusion of all safety related pumps and valves in the IST Program. This was accomplished by reviewing the Q-list and Component Classification Documents.

During the performance of the annual inservice testing program review, on December 7, 1990, the IST Coordinator discovered that several valves were excluded from a LaSalle operating surveillance. Valves 1(2)E12-F073A/B and 1(2)E12-F074A/B were added to the IST Program during the revision to comply with Generic Letter 89-04.

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B. DESCRIPTION OF EVENT Continued

Prior to Generic Letter 89-04, these valves were stroke timed during refuel outages per LOS-RH-Q3. Position Indication Testing was also performed per LOS-RH-Q3. The testing delineated in LOS-RH-Q3 was not required for the IST Program. Due to the fact that these valves are primary containment isolation valves, they are also leak rate tested during refuel outages.

The valves identified were added to the IST Program due to Generic Letter 89-04 and currently required quarterly stroke time testing. Due to the new Inservice Testing requirements, the valves should have been added to LOS-RH-Q2. 1(2)E12-F073A/B and 1(2)E12-F074A/B were not placed into LOS-RH-Q2 (RHR and RHR SW Valve Inservice Test for Conditions 1, 2, and 3), which allows for quarterly testing of these valves. A period of approximately ten months has elapsed since the previous testing of 1(2)E12-F073A/B and 1(2)E12-F074A/B.

Technical Specification 4.0.5 invokes the performance of inservice testing of ASME Code Class 1, 2, and 3 pumps and valves in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable addenda as required by 10 CFR 50, Section 50.55a(g). The procedural deficiency was a violation to the IST Program and therefore a violation of Technical Specification 4.0.5.

The completed annual review of the IST program found no other pumps or valves which were not included in appropriate procedure.

This event is being reported pursuant to 10CFR50.73 (a) (2) (i) due to missing a Technical Specification Surveillance.

C. APPARENT CAUSE OF EVENT

The cause of this event was a deficient procedure. LaSalle Operating Surveillance LOS-RH-Q2 did not include all of the valves requiring stroke timing per the IST Program. Personnel error contributed to this event as LOS-RH-Q2 was not properly revised to test the valves which were added to the inservice testing program as a result of complying with the generic letter.

Other contributing factors:

1. A major revision to the IST Program was required to be completed in a short time frame.
2. The IST administrative procedure (LTP-600-04) should have included a requirement to perform an independent review on the applicable procedures following a major IST Program revision.

D. SAFETY ANALYSIS OF EVENT

Valves 1(2)E12-F073A/B and 1(2)E12-F074A/B (RHR Heat Exchanger Vent Valves) are only normally used during the steam condensing operational mode of the Residual Heat Removal (RHR) System. This mode of operation is not utilized at LaSalle Station. These valves are normally closed; furthermore, there is no specified closure time in the Technical Specification or UFSAR. This event imposed a minimal impact in regards to safe operation of the plant. The valves were satisfactorily stroke timed, and no valve degradation was observed. The significance of this event is minimal considering the fact that these valves had previously been testing at 18 month intervals. However, the valves presently required quarterly testing to comply with LaSalle County Station IST Program which was not being accomplished.

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E. CORRECTIVE ACTIONS

On December 7, 1990 the eight RHR Heat Exchanger Vent Valves were satisfactorily stroke timed. No sign of valve degradation was noted.

Surveillance LOS-RH-Q2 will be revised to include quarterly stroke timing of 1(2)E12-F073A/B and 1(2)E12-F074A/B. Procedure LTP-600-04 will be revised to include a requirement for reviewing the IST Program and applicable procedures after a major program revision. Action Item Record (AIR) 373-200-90-09001 will track these procedure revisions.

An independent review of IST Program will be performed and tracked by AIR 373-200-90-09002.

F. PREVIOUS EVENTS

LER Number	Title
373/86-010-00	Failure To Perform Surveillance On RHM And RSCS During A Power Reduction.
373/90-002-00	Turbine Weekly Surveillance Exceeded Critical Date Due To Personnel/Procedural Errors.

G. COMPONENT FAILURE DATA

Not applicable.