

SOUTH CAROLINA ELECTRIC & GAS COMPANY

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O. W. DIXON, JR.
VICE PRESIDENT
NUCLEAR OPERATIONS

December 16, 1982
DEC 20 A10: 50

Mr. James P. O'Reilly, Director
U.S. Nuclear Regulatory Commission
Region II, Suite 3100
101 Marietta Street, N.W.
Atlanta, Georgia 30303

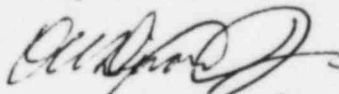
SUBJECT: Virgil C. Summer Nuclear Station
Docket No. 50/395
Operating License No. NPF-12
Fourteen Day Written Report
LER 82-044

Dear Mr. O'Reilly:

Please find attached Licensee Event Report #82-044 for Virgil C. Summer Nuclear Station. This Fourteen Day Report is required by Technical Specification 6.9.1.12.(F) as a result of inconsistencies indentified in the performance of Inservice Inspection Pump Program testing performed on the Residual Heat Removal Pumps (Technical Specification 3.5.2).

Should there be any questions, please call us at your convenience.

Very truly yours,



O. W. Dixon, Jr.

ARK:OWD:dwf
Attachment

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DETAILED DESCRIPTION OF EVENT

On December 2, 1982, with the Plant operating in Mode 1, the NRC Resident Inspector informed the Licensee that a surveillance test performed on October 5, 1982, for Residual Heat Removal (RHR) Pump A was approved as being satisfactory when the acceptance criteria was not fully met. Technical Specification 4.5.2.F.2 requires that a 128 psid be obtained for the RHR pumps on recirculation flow. The test results on October 5, 1982, indicated 127 psid. This test was performed again on November 5, 1982, with satisfactory results. During the time period from October 5, 1982, to November 5, 1982, the Plant was in Modes 1, 2, and 3 for approximately 23 days. Technical Specification 3.5.2, "ECCS Subsystems - $T_{avg} \geq 350^{\circ}\text{F}$," requires that two (2) RHR pumps be OPERABLE for Modes 1, 2, and 3.

PROBABLE CONSEQUENCES

There were no adverse consequences. As a result of the actions taken as described below, there is no indication of abnormal pump performance. Instead, personnel errors were found to exist in the methods of performing the tests, collecting and analyzing the data.

CAUSE(S) OF THE OCCURRENCE

In general, the cause of the occurrence is attributed to personnel error due to lack of experience in the methods that the tests were being performed and the methods that data were being gathered and analyzed. Specifically, the following items have been identified as contributing causes:

1. A review of previous RHR pump tests indicated apparent inconsistencies existed in the methods that data were being gathered. Also, in some cases, the test data were not properly analyzed for acceptability.
2. Personnel involved in performing pump tests were not properly instructed on proper techniques for taking the required data. This lack of technical supervision contributed to inconsistent data.

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3. Due to plant mode restrictions, two methods of testing the RHR pumps were developed. The procedure was not clear on which method of testing was actually required in Modes 4, 5, and 6. This resulted in confusion when selecting the correct baseline data for acceptance. Additionally, the data sheet acceptance criteria for minimum pump differential pressure did not address the Technical Specification limit. This contributed directly to the personnel error which has been identified.
4. It has been recognized that the installed instrumentation calibration schedule was on an 18 month cycle. This potentially contributed to the data inconsistencies found in the review.
5. Both trains of RHR were later found to require venting. Even though this condition would not have adversely affected the operation of the system in the accident mode of operation, it could have affected the accuracy of the data gathered.

IMMEDIATE CORRECTIVE ACTIONS TAKEN

The following immediate corrective actions were initiated by the Licensee:

1. To verify OPERABILITY, the RHR pumps were immediately retested. These tests were conducted utilizing experienced staff engineering personnel familiar with Inservice Inspection program requirements in order to ensure proper test methods were utilized. This testing was completed on December 3, 1982, with both pumps found to be acceptable.
2. For both RHR pumps, previous test data were reviewed and found to be acceptable.

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ACTION TAKEN TO PREVENT RECURRENCE

The following actions are being taken to prevent recurrence:

1. In order to ensure that operations and staff technical personnel involved with performing tests as required by the Inservice Inspection Pump Program are knowledgeable of the requirements of the program and understand its importance, a presentation will be prepared and presented to these personnel. This training will be complete by March 31, 1983.
2. Until the action identified in item (1) above is accomplished, experienced staff engineering personnel will assist in the performance of the tests.
3. A review of the adequacy of installed instrumentation is in progress. In cases where it is determined that installed instruments are not adequate for test purposes, calibrated test instrumentation will be used in their place. In cases where it is determined that installed instruments are adequate for test purposes, the performance of these instruments will be trended.
4. The calibration frequency of installed instrumentation used for testing is being increased to six month intervals. This frequency will be adjusted if trend performance of instruments indicate the need. This will be accomplished by December 31, 1982.
5. The RHR pump test procedure is being revised to remove confusion on correct system alignment for mode of operation and proper collection of required data. The associated data sheets are also being revised to include all limits established by the Inservice Inspection Program and Technical Specification acceptance criteria. This action will be accomplished by December 31, 1982.