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The Northeast Utilities System

Ted C. Feigenbaum
Senior Vice President &
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October 11, 1994

United States Nuclear Regulatory Commission
Washington, D.C. 20555

Attention: Document Control Desk

Reference: Facility Operating License No. NPF-86, Docket No. 50-443

Subject: Licensee Event Report (LER) No. 94-015-00: "Missed Technical Specification 4.0.5 Surveillances"

Gentlemen:

Enclosed please find Licensee Event Report (LER) No. 94-015-00 for Seabrook Station. This submittal documents an event which was identified on September 9, 1994. This event is being reported pursuant to 10CFR50.73(a)(2)(i).

Should you require further information regarding this matter, please contact Mr. James M. Peschel, Regulatory Compliance Manager, at (603) 474-9521, extension 3772.

Very truly yours,

Ted C. Feigenbaum

TCF:EWM/ewm

Enclosures: NRC Forms 366, 366A



IE22

cc: Mr. Thomas T. Martin
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NRC FORM 366 (5-92) U.S. NUCLEAR REGULATORY COMMISSION

APPROVED BY OMB NO. 3150-0104
EXPIRES 5/31/95

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 50.0 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE INFORMATION AND RECORDS MANAGEMENT BRANCH (MNBB 7714), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555-0001, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

# LICENSEE EVENT REPORT (LER)

(See reverse for required number of digits/characters for each block)

| FACILITY NAME (1) | DOCKET NUMBER (2) | PAGE (3) |
|---|---|---|
| Seabrook Station | 05000443 | 1 OF 3 |

TITLE (4)
Missed Technical Specification 4.0.5 Surveillances on Main Steam Drain Valves

| 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 NAME | DOCKET NUMBER |
| 09 | 09 | 94 | 94 | 15 | 00 | 10 | 11 | 94 | | 05000 |
| | | | | | | | | | FACILITY NAME | DOCKET NUMBER 05000 |

| OPERATING MODE (9) | 1 |
|---|---|
| POWER LEVEL (10) | 100 |

THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more) (11)

| | | | | | |
|---|---|---|---|---|---|
| | 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)(vii) | OTHER |
| | 20.405(a)(1)(iii) | X | 50.73(a)(2)(i) | 50.73(a)(2)(viii)(A) | (Specify in Abstract below and in Text, NRC Form 366A) |
| | 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 (Include Area Code) |
|---|---|
| Mr. James M. Peschel, Regulatory Compliance Manager | (603) 474-9521 Ext. 3772 |

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 15 single-spaced typewritten lines) (16)

On September 14, 1994 it was discovered that two Main Steam Drain (MSD) valve stroke time surveillances had not been performed as required by Technical Specification Surveillance Requirement 4.0.5. This surveillance demonstrates the operability of the MSD containment isolation valves and requires these valves to be stroke tested every 92 days, or 115 days including the 25% extension allowed by Technical Specification 4.0.2. Contrary to this requirement, the requisite operability surveillances on MSD-V44 and MSD-V47 were not performed within the required timeframe, including the 25% extension allowed by Technical Specification 4.0.2, by approximately 5 days. On May 17, 1994 the surveillance was successfully completed on MSD-V44 and MSD-V47. Thus the next required surveillance end date should have been September 9, 1994. These surveillances were subsequently successfully performed on September 14, 1994.

There were no adverse safety consequences as a result of this event. The requisite containment isolation valve stroke tests were immediately performed upon determination that the surveillance had not been performed. This test demonstrated that the stroke time was less than the Technical Specification requirements for the same.

The root cause for this event was determined to be an inadequate procedure which did not provide the necessary guidance required to complete repetitive task sheets and/or provide specific guidance for situations when taking credit for previously performed surveillances.

The MSD valve stroke tests were performed immediately upon determination that the surveillance had not been completed. In addition, the Data Management Group reviewed all outstanding date changes to ensure there were no other activities that required credit date updates. Long term corrective actions include: revising procedures governing Repetitive Task Sheets and surveillance activities, and providing training to Work Group Supervisors regarding these procedure changes.

I. DESCRIPTION OF EVENT

On September 14, 1994 it was discovered that two Main Steam Drain (MSD) valve stroke time surveillances had not been performed as required by Technical Specification Surveillance Requirement 4.0.5. This surveillance demonstrates the operability of the MSD containment isolation valves and requires these valves to be stroke tested every 92 days, or 115 days including the 25% extension allowed by Technical Specification 4.0.2. Contrary to this requirement, the requisite operability surveillances on MSD-V44 and MSD-V47 were not performed within the required timeframe, including the 25% extension allowed by Technical Specification 4.0.2, by approximately 5 days. On May 17, 1994 the surveillance was successfully completed on MSD-V44 and MSD-V47. Thus the next required surveillance end date should have been September 9, 1994. These surveillances were subsequently successfully performed on September 14, 1994.

Technical Specification 3.6.3, "Containment Isolation Valves" requires that each containment isolation valve be OPERABLE in Modes 1-4. Technical Specification Surveillance Requirement 4.6.3.3 requires that the isolation time of each power-operated or automatic containment isolation valve shall be determined to be within its limit when tested pursuant to Technical Specification 4.0.5.

On March 10, 1994 the plant entered MODE 5 and commenced the third refueling outage (OR03). On May 17, 1994 the aforementioned MSD valves were stroke tested per Operations procedure OX1456.81, "Operability Testing of IST Valves", Activity Number 1-ECCS-OT065. This procedure is intended to provide a mechanism to perform operability tests of power operated valves in the IST program that have been repaired, replaced, or undergone maintenance. In addition, this procedure provides a mechanism for obtaining valve stroke times as required by other procedures.

Inservice testing which verifies the opening and closing times of the MSD valves is normally performed in accordance with OX1430.03, "Main Steam Drain Valve Operability Tests", Activity Number 1-MSD-OT001. Included in this procedure are the main steam drain valves MSD-V44, and MSD-V47. OS1430.03 verifies that the stroke time of certain valves is within the times specified in OX1456.81 and that the remote position indicator for each valve accurately indicates the valve position.

On July 19, 1994 the Operations Department was assigned Repetitive Task Sheet (RTS) 1MSD-OT001 which required completion prior to entry into MODE 4. The RTS is the administrative vehicle used by North Atlantic to document surveillance test accomplishment. The Operations Work Group Supervisor took credit for the operability retest valve strokes obtained on May 17, 1994 and signed the RTS off with a completion code of "C" (Completed) on July 19, 1994. Since the actual performance date of the valve strokes for MSD-V44 and MSD-V47 did not occur within the scheduled performance window annotated on the RTS, the surveillance tracking database (SPECAPPRAISAL) required an update which would recalculate the next required performance window. The RTS should have been signed off with a completion code of "P" (Partial), which would have required the Data Management Technician to credit the surveillance prior to closing out the RTS. This would have then automatically resheduled the RTS with the next required performance dates.

II. SAFETY CONSEQUENCES

There were no adverse safety consequences as a result of this event. The requisite containment isolation valve stroke tests were immediately performed upon determination that the surveillance had not been performed. This test demonstrated that the stroke time was less than the Technical Specification requirements for the same. Based on this, it is concluded that these valves were always capable of closing within the analyzed time, and therefore, at no time during this event was the any impact on the health and safety of plant employees or the public.

III. CAUSE OF EVENT

The root cause for this event was determined to be an inadequate procedure regarding completion of RTS forms and/or specific guidance for situations when taking credit for previously performed surveillances. The procedure governing the performance of RTS and surveillance activities does not clearly describe the method to be used to ensure that surveillances are properly rescheduled when they are not performed within the scheduled surveillance window or when credit is taken for surveillances completed outside the performance window. A contributing cause was the untimely update of the SPECAPPRAISAL database. The updated SPECAPPRAISAL database would have rescheduled the surveillance for an earlier surveillance start date.

IV. CORRECTIVE ACTIONS

The MSD valve stroke tests were performed immediately upon determination that the surveillance had not been completed. In addition, the Data Management Group reviewed all outstanding date changes to ensure there were no other activities that required credit date updates. To prevent this event from occurring in the future the following corrective actions will be performed:

1. The procedures governing Repetitive Task Sheets and surveillance activities will be revised to provide specific guidance regarding surveillance completion codes and credit dates. These procedure revisions will provide the necessary guidance when dealing with situations when credit is taken for previously performed surveillances. This would ensure the proper credit date is used to reschedule surveillance activities.

2. Work Group Supervisors will be trained regarding these procedure changes to ensure the proper completion codes and credit dates are used when completing surveillance activities.

V. PLANT CONDITIONS

The plant was in Mode 1, 100 percent power, when the missed Technical Specification 4.0.5 surveillances were identified.

North Atlantic reported other instances where surveillance requirements were missed in Licensee Event Reports (LER) 92-003-01, 92-014-00, 92-023-00 and 94-014-000.