



Nuclear Group
P.O. Box 4
Shippingport, PA 15077-0004

Telephone (412) 293-6000

December 9, 1991
ND3MNO:3221

Beaver Valley Power Station, Unit No. 1
Docket No. 50-334, License No. DPR-66
LER 91-030-00

United States Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555

Gentlemen:

In accordance with Appendix A, Beaver Valley Technical Specifications, the following Licensee Event Report is submitted:

LER 91-030-00, 10 CFR 50.73.a.2.i.B, "Inadequate Filter Bank Surveillance Testing".

Very truly yours,

T. P. Noonan
General Manager
Nuclear Operations

DC/sl

Attachment

100110

9112160079 911209
PDR ADOCK 05000334
S PDR

IE22
11

December 9, 1991

ND3MNO:3221

Page two

cc: Mr. T. T. Martin, Regional Administrator
United States Nuclear Regulatory Commission
Region 1
475 Allendales Road
King of Prussia, PA 19406

C. A. Roteck, Ohio Edison
76 S. Main Street
Akron, OH 44308

Mr. A. DeAgazio, BVPS Licensing Project Manager
United States Nuclear Regulatory Commission
Washington, DC 20555

J. Beall, Nuclear Regulatory Commission,
BVPS Senior Resident Inspector

Larry Beck
Centerior Energy
6200 Oak Tree Blvd.
Independence, Ohio 44101-4661

INPO Records Center
Suite 1500
1100 Circle 75 Parkway
Atlanta, GA 30339

G. E. Muckle,
Factory Mutual Engineering
680 Anderson Drive #BLD10
Pittsburgh, PA 15220-2773

Mr. Richard Janati
Department of Environmental Resources
P. O. Box 2063
16th Floor, Fulton Building
Harrisburg, PA 17120

Director, Safety Evaluation & Control
Virginia Electric & Power Co.
P.O. Box 26666
One James River Plaza
Richmond, VA 23261

W. Hartley
Virginia Power Company
5000 Dominion Blvd.
2SW Glenn Allen, VA 23060

J. M. Riddle
NUS Operating Service Corporation
Park West II
Cliff Mine Road
Pittsburgh, PA 15275

December 9, 1991
ND3MNO:3221
Page three

Bill Wegner, Consultant
23 Woodlawn Terrace
Fredricksburg, VA 22404

LICENSEE EVENT REPORT (LER)

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 60.0 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE RECORDS AND REPORTS MANAGEMENT BRANCH (F-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) Beaver Valley Power Station Unit 1		DOCKET NUMBER (2) 0 5 0 0 0 3 3 4	PAGE (3) 1 OF 0 3
---	--	--	------------------------

TITLE (4)
Inadequate Filter Bank Surveillance Testing

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	1	0	8	9	1	9	1	0	3	0	0	N/A			0 5 0 0 0
1	1	0	8	9	1	9	1	0	3	0	0				0 5 0 0 0

OPERATING MODE (9) 5

POWER LEVEL (10) 0 | 0 | 0

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

<input type="checkbox"/> 20.402(b)	<input type="checkbox"/> 20.405(c)	<input type="checkbox"/> 60.73(a)(2)(iv)	<input type="checkbox"/> 73.71(b)
<input type="checkbox"/> 20.405(a)(1)(ii)	<input type="checkbox"/> 60.36(c)(1)	<input type="checkbox"/> 60.73(a)(2)(v)	<input type="checkbox"/> 73.71(c)
<input type="checkbox"/> 20.405(a)(1)(iii)	<input type="checkbox"/> 60.36(c)(2)	<input type="checkbox"/> 60.73(a)(2)(vi)	OTHER (Specify in Abstract below and in Text, NRC Form 396A)
<input type="checkbox"/> 20.405(a)(1)(iii)	<input checked="" type="checkbox"/> 60.73(a)(2)(ii)	<input type="checkbox"/> 60.73(a)(2)(vii)(A)	
<input type="checkbox"/> 20.405(a)(1)(iv)	<input type="checkbox"/> 60.73(a)(2)(iii)	<input type="checkbox"/> 60.73(a)(2)(vii)(B)	
<input type="checkbox"/> 20.405(a)(1)(iv)	<input type="checkbox"/> 60.73(a)(2)(iii)	<input type="checkbox"/> 60.73(a)(2)(ix)	

LICENSEE CONTACT FOR THIS LER (12)

NAME T.P. Noonan, General Manager Nuclear Operations	TELEPHONE NUMBER AREA CODE: 4 1 2 6 4 3 - 1 2 5 8
---	--

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

CAUSE	SYSTEM	COMPONENT	MANUFAC TURER	REPORTABLE TO NRC	CAUSE	SYSTEM	COMPONENT	MANUFAC TURER	REPORTABLE TO NRC
D	V	F	X	X	X	X	X	X	N

SUPPLEMENTAL REPORT EXPECTED (14)

YES (If yes, complete EXPECTED SUBMISSION DATE): NO

EXPECTED SUBMISSION DATE (15)

MONTH	DAY	YEAR

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

On 11/8/91 during a management reevaluation of Safety System Functional Examination (SSFE) audit findings, a reportable finding, concerning an unconservative test method for determining the Supplementary Leakage Collection and Release System (SLCRS) Filter removal efficiency was identified. The test method in place at that time only determined filter bank removal efficiency and excluded bypass damper leakage effects which would lower the systems' overall efficiency. Therefore, the systems' overall removal efficiency may not have met Technical Specification requirements. Upon issuance of the SSFE finding, it was determined that if bypass damper leakage was less than 500 CFM then required limits would not have been exceeded. Actual leakage measurements verified that this leak rate was not exceeded. After revising the test method to account for bypass damper leakage, both trains of SLCRS filter banks were satisfactorily tested. The SSFE is an ongoing internal self-assessment process.

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST 500 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE RECORDS AND REPORTS MANAGEMENT BRANCH (P-530), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20545, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

FACILITY NAME (1) Beaver Valley Power Station Unit 1	DOCKET NUMBER (2) 0 15 0 0 0 3 3 4	LER NUMBER (6)			PAGE (3)	
		YEAR 9 1	SEQUENTIAL NUMBER - 0 3 0	REVISION NUMBER - 0 0	OF	0 2 0 3

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

DESCRIPTION OF EVENT

On 10/15/91, a management reevaluation of previous Safety System Functional Examination (SSFE) audit findings was initiated. As a result of this review, on 11/8/91, an SSFE finding, issued on 10/15/90, was determined to have identified a reportable event.

This finding identified an unconservative test method for determining the Supplementary Leakage Collection and Release System (SLCRS) Filter efficiency. Technical Specifications require that testing be conducted, in accordance with ANSI N510-1975 such that the test gas be injected upstream of all possible filter bank bypasses and be sampled downstream of any rejoining bypass lines to determine the overall system filter removal efficiency. Contrary to this, only the filter bank itself was tested resulting in apparently higher than actual system filter efficiency.

In 1990, upon notification of this finding, immediate corrective actions were taken. Health Physics determined that the maximum allowable bypass damper leak rate to ensure that 10CFR100 limits would not be exceeded was 500 CFM. Testing personnel conducted leakage measurements for the bypass dampers and verified the "as-found" leak rate was less than this value.

After revising test procedures to correctly locate the injection and sampling points, both trains of SLCRS filter banks were satisfactorily tested on 10/25/90 and 12/13/90.

CAUSE OF THE EVENT

Technical Specifications require that SLCRS filter bank testing be conducted in accordance with ANSI N510-1975. This standard requires that tests be designed such that the test gas be injected upstream of all possible bypasses of the filter bank and be sampled downstream of any bypass rejoining lines to determine the overall system filter removal efficiency. Contrary to this, testing prior to 10/25/90 did not meet Technical Specification surveillance requirements.

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST 500 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE RECORDS AND REPORTS MANAGEMENT BRANCH (F-520), 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		
Beaver Valley Power Station Unit 1	0 5 0 0 0 3 3 4	9 1	- 0 3 0	- 0 0	0 3	OF 0 3

TEXT (if more space is required, use additional NRC Form 306A's) (17)

CORRECTIVE ACTIONS

The following corrective actions have been or shall be taken as a result of this event:

1. Station personnel determined that filter bank bypass flow was not in excess of the values calculated to ensure that no 10CFR100 limits were exceeded.
2. The testing procedures were revised in 1990 to meet the requirements of ANSI N510-1975.

REPORTABILITY

Operability of the SLCRS exhaust air filter trains had not been verified as specified by the Technical Specification surveillance requirements. Therefore, determination of reportability was made by management review 11/8/91. Accordingly, this written report is being submitted in accordance with 10 CFR 50.73.a.2.i.B, as an event or condition prohibited by Technical Specifications.

SAFETY IMPLICATIONS

There were no safety implications due to this event. It was immediately determined that the bypass damper leak rate was too low to result in exceeding 10CFR100 limits.

SIMILAR EVENTS

Review of station documents showed the following previous similar reportable events occurred:

1. LER 84-013, "Failure to meet ASME Section XI IST Requirements."
2. LER 84-006, "Inadequate Surveillance Testing and Test Results."
3. LER 84-005, "Missed Surveillances."

All three events involved missed surveillance requirements due to procedural deficiencies which have been corrected.