

Log # TXX-92086 File # 10200 Ref. # 10CFR50.73(a)(2)(1)

February 7. 1992

William J. Cahill, Jr. Group Vice President

U. S. Nuclear Regulatory Commission Attn: Document Control Desk Washington, DC 20555

COMANCHE PEAK STEAM ELECTRIC STATION (CPSES) SUBJECT: DOCKET NO. 50-445 OPERATION PROHIBITED BY TECHNICAL SPECIFICATIONS LICENSEE EVENT REPORT 90-024-01

Gentlemen:

Enclosed is Licensee Report 90-024-01 for Comanche Peak Steam Electric Station Unit 1. "Failure to Comply With Technical Specification Action Statement Due to Inadequate Post Trip Review."

This report is being provided to revise corrective actions previously identified for Licensee Event Report 90-024-00.

Sincerely.

William J. Cahill, Jr.

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PDR

c - Mr. R. D. Martin, Region IV Resident Inspectors, CPSES (2)

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LICENSEE EVENT REPORT (LER)						APPROVED OMBIND, 3150-0104 EXPIRES: 4/30/32 ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMU COLLECTION REQUEST: 50.0 HRS. FORWARD COMMENTS REGAR BURDEN ESTIMATE TO THE RECORDS AND REPORTS MANAGE BRANCH (P-530), U.S. NUCLEAR REGULATORY COMMISSION, WASHIN DC, 20555, AND TO THE PAPERWORK REDUCTION PROJECT (3150 OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC, 20503.												
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On August 24, 1990, Comanche Peak Steam Electric Station Unit 1 was in Mode 1, Power Operations, with Reactor Power at 100 percent. While preparing to perform surveillance testing on containment purge and hydrogen purge isolation valves, Test Department personnel discovered that testing activities were not being performed on a STAGGERED TEST BASIS as specified by the associated Technical Specification. The event was caused by personnel error during initial surveillance program development. The individual responsible for inputting data to the scheduling database overlooked the requirement. Corrective actions included testing and program review.

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1. DESCRIPTION OF THE REPORTABLE EVENT

## A. REPORTABLE EVENT CLASSIFICATION

Any deviation from the plant's Technical Specifications.

#### B. PLANT OPERATING CONDITIONS BEFORE THE EVENT

On August 24, 1990 just prior to 1237 hours CDT, Comanche Peak Steam Electric Station (CPSES) Unit 1 was in Mode 1, Power Operations, with reactor power at approximately 100 percent.

## C. STATUS OF STRUCTURES, SYSTEMS, OR COMPONENTS THAT WERE INOPERABLE AT THE START OF THE EVENT AND THAT CONTRIBUTED TO THE EVENT

There were no inoperable structures, systems or components that contributed to the event.

## D. NARRATIVE SUMMARY OF THE EVENT, INCLUDING DATES AND APPROXIMATE TIMES

On August 24, 1990, prior to event discovery, a test engineer (utility, non-licensed) was preparing to perform surveillance testing on containment purge and hydrogen purge isolation valves (EIIS:(BB)(VA)(ISV)) to satisfy Technical Specification Surveillance Requirement 4.6.1.7.2. While reviewing associated documents prior to performing the test, the test engineer made the following observations:

- The Technical Specification requires the surveillance to be performed at least once per 184 days on a STAGGERED TEST BASIS, as defined by Technical Specification Definition 1.34.
- The surveillance test procedure did not indicate this test is performed on a STAGGERED TEST BASIS.

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	•	The Surveilla activity and h BASIS.	nce Work Orders (SWOs) s ad no indication this test is	specified a 6 r performed on	nonti a S1	n freque FAGGEF	ncy fo RED T	r this EST	
	•	The Managed scheduling sy to schedule th performed on	d Maintenance Computer P stem contained only one d his activity. This database a STAGGERED TEST BA	rogram (MMC atabase entry entry had no i SIS.	P) si with indica	urveillan a 6 moi ation this	ce hth fre i test i	quenc	су
	Ŧ	Approximatel previously tes BASIS interva	y 5 1/2 months had passed sted together on a previous al.	since all of th SWO with no	ne va STA	lves had AGGERE	been D TE	ST	
	The con BAS app so a	test engineer tractor, non-lice SIS definition to roximately 123 as to satisfy the	then initiated discussion with ensed) to determine the app of the testing of these contain 7 CDT, it was concluded the STAGGERED TEST BAS	th other plant plicability of th nment isolation at the testing IS requirement	persone ST on va had nt.	onnel (u 'AGGEF Ives. At not beer	tility a RED T n sche	nd EST eduled	
E.	THI	E METHOD OF	DISCOVERY OF EACH O	OMPONENT	OR	SYSTE	М		
	Whi to te inqu test pers	le reviewing Te esting, the test uiring about the ing of these co sonnel realized	echnical Specifications Sum engineer noted the STAGG applicability of the STAGG ntainment penetration (EIIS the valves had not been te	veillance Requ ERED TEST ERED TEST S:(BB)(VA)(PE sted at the pr	uirem BAS BAS EN)) i oper	ient 4.6. IS requi IS defini solation interval	1.7.2, remen tion to valve: s.	prior nt. Aft the s, plai	er nt
II. <u>CO</u>	MPO	NENT OR SYS	TEM FAILURES						
A.	FAI	LED COMPON	ENT INFORMATION						
	Not	applicable - th	ere were no component fai	lures associa	ted w	ith this (	event.		
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	6.	FAILURE MODE, N COMPONENT	MECHANISM AND R	EFFECT OI	FEAC	H FAII	LED				
		Not applicable - the	re were no compone	ent failures	assoc	iated w	vith t	this e	vent.		
	c.	CAUSE OF EACH	COMPONENT OR S	SYSTEM F	AILUF	E					
		Not applicable - the	re were no compone	ent failures	assoc	iated w	vith t	this e	vent.		
	D.	SYSTEMS OR SEC FAILURE OF COM Not applicable - the	CONDARY FUNCTION PONENTS WITH M The were no compone	ONS THAT ULTIPLE F ent failures	WER UNCT assoc	E AFF TIONS iated w	ECT	'ED E	9 <b>Y</b> vent.		
111.	AN	ALYSIS OF THE EV	ENT								
	Α.	SAFETY SYSTEM	RESPONSES THAT	T OCCURF	ED						
		Not applicable - no	safety system respo	nses assoc	ciated	with th	is ev	/ent.			
	в.	DURATION OF SA	FETY SYSTEM INC	PERABILI	TY						
		Not applicable - the	re were no safety sy	stems rend	dered i	nopera	able	due t	o a fa	ilure.	
	C.	SAFETY CONSEQ	UENCES AND IMPI	LICATIONS	S OF T	HE EV	/EN	т			
		The containment pulleakage of radioaction operation and accide Appendix A, requirer isolation function is testing of those value ensuring that the boot Staggered testing is common cause, and increases the length	urge and hydrogen p ve material from cor lent conditions. Gen es that two isolation v maintained in the ev ves is performed to co bundary doses speci s performed to reduc d failure to perform the n of time that a comm	turge isolati ntainment ( neral Design valves in se vent of any demonstrate fied in 10C te the proba he required mon cause	on val EIIS:(N n Crite single e oper FR100 ability of testin system	ves are NH)) du ria 56 ( e provi active ability ( ) are no of syste g on a n failur	e de: uring of 10 ded failu of th ot ex em f stag	signe norm OCFR to as ure. S e con cceed ailure ggere build h	d to li 150, sure t Survei npone led. d bas ave g	mit the that the llance ents, to a is one	

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		undetected. The successful testing the condition demonstrates that the performing their intended safety fun containment. It is concluded that th TEST BASIS requirement associate affect the safe operation of OPSES	of the subject penetrations following discovery of penetrations were at all times capable of ction of limiting radioactive emissions from e short term failure to satisfy the STAGGERED d with testing of these valves did not adversely Unit 1 or the health and safety of the public.									
IV.	CAUSE OF THE EVENT											
	Α.	IMMEDIATE CAUSE										
		STAGGERED TEST BASIS require scheduling methodology for this act	ments were not incorporated into the surveillance vity.									
	в.	ROOT CAUSE										
		The root cause of the event was per STAGGERED TEST BASIS require	sonnel error which led to omission of the ment.									
		The station administrative procedure program requires that each organiza surveillance activities develop imple methods for scheduling and statusir responsibility. Plant personnel resp interval for this surveillance overlood requirement during initial test and so	e controlling the surveillance test ation responsible for performing menting procedures and incorporate ig all surveillances for which they have onsible for establishing the testing ked the STAGGERED TEST BASIS sheduling development.									
v.	co	RRECTIVE ACTIONS										
	٨.	IMMEDIATE										
		The test engineer documented the c and reported the status of the surve licensed). It was determined that th testing the inheard and outboard iso	ondition in accordance with station procedures Ilance requirement to the Shift Supervisor (utility, e intent of STB requirement could be satisfied by									

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penetration and one hydrogen purge penetration at the subinterval. Compliance with the STAGGERED TEST BASIS requirement was restored by successful testing of two of the four containment and hydrogen purge penetrations as specified by the Technical Specification action requirements.

## **B. ACTIONS TO PREVENT RECURRENCE**

A satisfactory review was performed of all surveillance activities with a STAGGERED TEST BASIS requirement to ensure that the requirement is acknowledged and implemented in activity scheduling. The administrative procedure controlling the surveillance program is being enhanced to clarify the STAGGERED TEST BASIS requirement and provide formal guidance ensuring consistent site wide scheduling of affected activities.

# VI. PREVIOUS SIMILAR EVENTS

LER 90-005 and LER 90-010 describe reportable events resulting from failure to perform Technical Specification surveillance activities. However, the details of the events described in those LERs and the resultant corrective actions are sufficiently different from those of this LER to conclude that the previous corrective actions could not be expected to have prevented the scheduling error described in this report.

### VII. ADDITIONAL INFORMATION

Corrective action described in the initial submittal of this LER included application of the STAGGERED TEST BASIS requirement to testing of the containment and hydrogen purge valves such that one isolation valve associated with each containment and hydrogen purge penetration would be tested at the first subinterval, with the other valve(s) tested in the second subinterval.

Additional review of related NRC correspondence following submittal of this LER revealed that the basis for the STAGGERED TEST BASIS requirement on leakage rate testing of the purge valves is to detect common mode failure (excess leakage) caused by seasonal

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weather variations. Staggering the inlet and outlet penetrations accomplishes the goal of testing under a variety of weather conditions, and meets the STAGGERED TEST BASIS requirements. This testing is consistent with the purge penetration design, which does not allow the inboard and outboard valves to be tested individually.

Accordingly, testing of the containment and hydrogen purge valves to satisfy the requirements of Technical Specification 4.6.1.7.2 will be conducted on a STAGGERED TEST BASIS so as to stagger testing of penetrations rather than individual valves.