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VPNPD-92-081
NRC-92-025

February 21, 1992

U. S. NUCLEAR REGULATORY COMMISSION
Document Control Desk
Mail Station P1-137
Washington, DC 20555

Gentlemen:

DOCKET 50-266
LICENSEE EVENT REPORT 92-002-00
MISSED VISUAL EXAMINATION OF REACTOR VESSEL INTERIOR
POINT BEACH NUCLEAR PLANT, UNIT 1

Enclosed is Licensee Event Report 92-002-00 for Point Beach Nuclear Plant, Unit 1. This report describes a missed visual examination of the Unit 1 reactor vessel interior. Section XI of the ASME Code and Point Beach Nuclear Plant Technical Specification 15.4.2.B.1 require an examination to be performed once each forty-month period during a ten-year interval. Contrary to this requirement, the examination was not performed.

NUREG-1022, Draft Revision 1 provides guidance to licensees to report missed surveillance requirements when the surveillance interval plus the allowable time extensions for conducting the surveillance have been exceeded. The required visual examination of the reactor vessel interior was not performed at the required surveillance periodicity, and this deficiency was not identified until the twelve-month allowable time extension had been exceeded. Therefore, this report is being provided as an informational Licensee Event Report.

If any further information is required, please contact us.

Sincerely,

A handwritten signature in cursive script that reads 'James J. Zach'.

James J. Zach
Vice President
Nuclear Power

Enclosure

Copies to NRC Resident Inspector, NRC Regional Administrator

9202250177 920221
PDR ADOCK 05000266
S PDR

240038

Handwritten initials or a signature in the bottom right corner of the page, possibly 'J. Zach'.

LICENSEE EVENT REPORT (LER)

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 50.0 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE RECORDS AND REPORTS MANAGEMENT BRANCH (P-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.

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| FACILITY NAME (1) Point Beach Nuclear Plant, Unit 1 | | DOCKET NUMBER (2) 0 5 0 0 0 2 6 6 1 | PAGE (3) 1 OF 0 5 |
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TITLE (4): Missed Visual Examination of Reactor Vessel Interior

| 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) |
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OPERATING MODE (9) N

POWER LEVEL (10) 1 0 1 0

THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR 2. (Check one or more of the following) (11)

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| <input type="checkbox"/> 20.402(b) | <input type="checkbox"/> 20.406(a) | <input type="checkbox"/> 50.73(a)(2)(iv) | <input type="checkbox"/> 73.21(a) |
| <input type="checkbox"/> 20.406(a)(1)(i) | <input type="checkbox"/> 30.38(a)(1) | <input type="checkbox"/> 50.73(a)(2)(v) | <input type="checkbox"/> 73.21(a) |
| <input type="checkbox"/> 20.406(a)(1)(ii) | <input type="checkbox"/> 30.38(a)(2) | <input type="checkbox"/> 50.73(a)(2)(vi) | <input checked="" type="checkbox"/> OTHER (Specify in Abstract below and in Text, NRC Form 366A) |
| <input type="checkbox"/> 20.406(a)(1)(iii) | <input type="checkbox"/> 50.73(a)(2)(i) | <input type="checkbox"/> 50.73(a)(2)(vii)(A) | |
| <input type="checkbox"/> 20.406(a)(1)(iv) | <input type="checkbox"/> 50.73(a)(2)(ii) | <input type="checkbox"/> 50.73(a)(2)(vii)(B) | |
| <input type="checkbox"/> 20.406(a)(1)(v) | <input type="checkbox"/> 50.73(a)(2)(iii) | <input type="checkbox"/> 50.73(a)(2)(ix) | |

LICENSEE CONTACT FOR THIS LER (12):

NAME: G. R. Sherwood, Senior Project Engineer-ISI Engrg.

TELEPHONE NUMBER: 4 1 1 4 7 1 5 1 5 - 1 2 3 1 2 1 1

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

| CAUSE | SYSTEM | COMPONENT | MANUFACTURER | REPORTABLE TO NRRDS | CAUSE | SYSTEM | COMPONENT | MANUFACTURER | REPORTABLE TO NRRDS |
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SUPPLEMENTAL REPORT EXPECTED (14):

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

EXPECTED SUBMISSION DATE (15):

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| MONTH | DAY | YEAR |
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ABSTRACT (Limit to 1400 words, i.e., approximately fifteen single-space typewritten lines) (16)

ABSTRACT

On January 22, 1992, during our review of the In-Service Inspection Long-Term Plan and associated records for examinations performed during the second ten-year interval for Point Beach Nuclear Plant Unit 1, we determined that a visual examination (VT-3) of accessible portions of the inside of the reactor vessel was not performed at the required periodicity. This examination is required by the 1977 Edition, Summer 1979 Addendum of the ASME Section XI Code, Article IWB-2500, Category B-N-1. The ASME Section XI Code requires this examination be performed once each forty-month period during the second ten-year interval. Contrary to this requirement, the examination was not performed during the last forty-month period of the second ten-year interval. The second ten-year interval for Point Beach Nuclear Plant Unit 1 ended on December 20, 1990.

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

| | | | | | | | |
|-----------------------------------|-------------------------------|----------------|-------------------|-----------------|-------|----------|--|
| FACILITY NAME (1) | DOCKET NUMBER (2) | LER NUMBER (6) | | | | PAGE (3) | |
| | | YEAR | SEQUENTIAL NUMBER | REVISION NUMBER | | | |
| Point Beach Nuclear Plant, Unit 1 | 0 5 0 0 0 2 6 6 | 9 2 | -- 0 0 2 | -- 0 0 | 0 2 | OF 0 5 | |

TEXT IF MORE SPACE IS REQUIRED USE ADDITIONAL NRC Form 3664 (17)

DESCRIPTION OF EVENT

The In-Service Inspection Long-Term Plan for ASME Code Class 1, Class 2, and Class 3 components is prepared and performed in accordance with the ASME Section XI Code, as required by 10 CFR 50.55a, and Point Beach Nuclear Plant Technical Specification 15.4.2.B.1. The Plan for the second ten-year interval for the Point Beach Nuclear Plant Unit 1 was prepared to the standards in the 1977 Edition, Summer 1979 Addendum of ASME Section XI. Relief requests from certain Code requirements were submitted to the NRC for approval on August 20, 1982. The submitted relief requests were considered in the development of the second ten-year inspection plan.

Relief Request RR-1-1, submitted with the August 20, 1982, letter, requested relief from the requirements of Article IWB 2500, Category B-N-1. B-N-1 requires that a VT-3 visual examination of the inside of the reactor vessel be performed once each forty-month period during the ten-year interval. The required visual examination includes the spaces above and below the reactor core that are made accessible for examination by removal of components during normal refuelings. For Point Beach Nuclear Plant, components removed during normal refueling outages include the upper internals package. Therefore, only a ten-inch band around the top of the reactor vessel circumference is accessible for visual examination. Relief Request RR-1-1 requested an exemption from the periodicity requirements and proposed that the visual examination be performed once during the ten-year interval while the reactor vessel lower internals are removed. We believed the examination proposed in this relief request would provide a more meaningful result, since a complete examination of the reactor vessel interior could be performed. The schedule of examinations for the second ten-year interval was prepared assuming this examination would be performed once during the interval.

On March 29, 1984, the NRC responded to our requests for relief from the Code requirements. Our request to perform the examination at a different periodicity from that required by Category B-N-1 was denied. Other relief requests were approved. We updated our In-Service Inspection Long-Term Plan at that time. The status of RR-1-1 was incorrectly entered as having been approved by the NRC. Due to this administrative error, the ISI Long-Term Plan scheduling data base incorrectly identified that the visual examination need only be performed once during the second ten-year period. The examination was scheduled to be performed when the reactor vessel lower internals were removed.

The visual examination required by B-N-1 of accessible areas of the reactor vessel was performed in 1984. A complete visual examination of the vessel interior was performed in 1987 when the vessel lower internals were removed. The required examination was not performed during the last

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

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|-----------------------------------|-------------------|----------------|-------------------|-----------------|----------|--------|
| FACILITY NAME (1) | DOCKET NUMBER (2) | LER NUMBER (8) | | | PAGE (3) | |
| | | YEAR | SEQUENTIAL NUMBER | REVISION NUMBER | | |
| Point Beach Nuclear Plant, Unit 1 | 0 5 0 0 0 2 6 6 | 9 2 | — 0 0 2 | — 0 0 | 0 3 | OF 0 5 |

TEXT OF THIS REPORT IS REQUIRED FOR ADDITIONAL NRC FORM 366A (17)

forty-month period of the second ten-year interval. The second ten-year interval ended on December 20, 1990. Therefore, the ASME Section XI requirements for this visual examination were not met.

CAUSE AND CORRECTIVE ACTION

During preparation of our In-Service Inspection Long-Term Plan for the second ten-year interval, it was assumed that the requested reliefs would be approved. Examinations were scheduled in the Long-Term Plan based on that assumption. The visual examination of the reactor vessel interior was, therefore, scheduled to be performed only once during the ten-year interval. This deviation from applicable Code requirements was identified during an independent review of the Long-Term Plan and associated records. This self-initiated independent review was conducted to ensure all Code-required examinations had been performed. A formal administrative procedure was not available to effectively control the Long-Term Plan scheduling data base. The data base entries were controlled by an ISI Coordinator, but provisions for an independent technical review were not in place.

The following corrective actions have been, or will be, taken to address this issue:

1. A visual examination (VT-3), as required by the Code, will be performed during the upcoming 1992 Unit 1 maintenance and refueling outage. This examination will be in addition to the examination required for the first forty-month period of the third ten-year interval.
2. A justification for continued operation was prepared and approved for the period between the end of the second ten-year interval and the visual examination scheduled to be performed during the 1992 Unit 1 refueling and maintenance outage.
3. Action was taken to ensure that this visual examination was performed as required for Point Beach Nuclear Plant Unit 2. A review of the Unit 2 ISI Long-Term Plan and associated records demonstrated that the reactor vessel visual examinations have been performed as required by the Code.
4. The In-Service Inspection Long-Term Plan for Point Beach Nuclear Plants Units 1 and 2 for the third ten-year period has been reviewed for conformance to this Code visual examination requirement. No discrepancies were identified.

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

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|-----------------------------------|-------------------|----------------|-------------------|-----------------|----------|--------|
| FACILITY NAME (17) | DOCKET NUMBER (2) | LER NUMBER (6) | | | PAGE (3) | |
| | | YEAR | SEQUENTIAL NUMBER | REVISION NUMBER | | |
| Point Beach Nuclear Plant, Unit 1 | 0 5 0 0 0 2 6 6 | 9 2 | 0 0 2 | 0 1 0 | 0 4 | OF 0 5 |

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5. A formal administrative procedure with requirements for independent review will be implemented to ensure proper control of the ISI Long-Term Plan scheduling data base. This procedure is expected to be implemented by October 1, 1992.
6. Periodic reviews of the ISI Long-Term scheduling data base will be conducted to ensure accuracy. These reviews will be conducted during each forty-month period to ensure that examinations are accomplished at the required periodicity.

REPORTABILITY

Failure to perform the surveillance as required by the ASME Section XI Code is a violation of Point Beach Nuclear Plant Technical Specification 15.4.2.B.1. This Technical Specification requires that the In-Service Inspection of ASME Code Class 1, Class 2, and Class 3 components be performed in accordance with this Code as required by 10 CFR 50.55a.

NUREG-1022, Draft Revision 1 provides guidance to licensees to report missed surveillance requirements when the surveillance interval plus the allowable time extensions for conducting the surveillance have been exceeded. The required VT-3 visual examination of the inside of the reactor vessel was not performed at the required surveillance periodicity, and this deficiency was not identified until the twelve-month allowable time extension had been exceeded. Therefore, this report is being provided as an informational Licensee Event Report.

SAFETY ASSESSMENT

A justification for continued operation was prepared and approved for the time between the end of the completed second ten-year inspection interval and the scheduled time of the visual examination. The visual examination is planned to be completed during the upcoming 1992 Unit 1 refueling outage. The visual examination is performed to document the physical condition and detect any cracks or gouges in the cladding on the interior of the reactor vessel. Previously conducted visual examinations have not identified any clad defects. No events that could have damaged the cladding have occurred since the last visual examination. The cladding is intended to provide corrosion protection for the carbon steel reactor vessel. No credit is taken for the cladding towards the design structural strength of the reactor vessel. The health and safety of plant staff and the public are not jeopardized.

SIMILAR OCCURRENCES

A review of past events was performed. No similar occurrences were identified.

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

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|-----------------------------------|---------------------|----------------|-------------------|-----------------|----------|------------|
| FACILITY NAME (11) | DOCKET NUMBER (2) | LER NUMBER (8) | | | PAGE (3) | |
| | | YEAR | SEQUENTIAL NUMBER | REVISION NUMBER | | |
| Point Beach Nuclear Plant, Unit 1 | 0 5 0 0 0 2 6 C 9 2 | — | 0 0 2 | — | 0 0 | 0 5 OF 0 5 |

TEXT IF more space is required, use additional NRC Form 365a (11)

GENERIC IMPLICATIONS

There are no known generic implications to this event.