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April 8, 1992  
ND3MNO:3282

Beaver Valley Power Station, Unit No. 1  
Docket No. 50-334, License No. DPR-66  
LER 91-019-01

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

Gentlemen:

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

LER 91-019-01, 10 CFR 50.73.a.2.i.A, and 10 CFR 50.73.a.2.i.B, "Missed Examinations Resulting From a Programmatic Review of ISI Program".

Very truly yours,

T. P. Noonan  
General Manager  
Nuclear Operations

JGT/sl

Attachment

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LICENSEE EVENT REPORT (LER)

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 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 7
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TITLE (4):  
Missed Examinations Resulting From a Programmatic Review of ISI Program

EVENT DATE (6)			LER NUMBER (8)			REPORT DATE (5)			OTHER FACILITIES INVOLVED (7)	
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	MONTH	DAY	YEAR	FACILITY NAME	DOCKET NUMBER (2)
0 3	1 2	9 2	0 1	0 1	9	0 1	0 4	0 8	N/A	0 5 0 0 0
										0 5 0 0 0

OPERATING MODE (9): 1	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR 50. (Check one or more of the following) (11)	
POWER LEVEL (10): 1 0 0	<input type="checkbox"/> 20.402(a) <input type="checkbox"/> 20.406(a)(1)(i)(ii) <input type="checkbox"/> 20.406(a)(1)(i)(iii) <input type="checkbox"/> 20.406(a)(1)(ii)(i) <input type="checkbox"/> 20.406(a)(1)(ii)(ii) <input type="checkbox"/> 20.406(a)(1)(ii)(iii)	<input type="checkbox"/> 20.408(a) <input type="checkbox"/> 50.36(a)(1) <input type="checkbox"/> 50.36(a)(2) <input checked="" type="checkbox"/> 50.73(a)(2)(i) <input type="checkbox"/> 50.73(a)(2)(ii) <input type="checkbox"/> 50.73(a)(2)(iii)
		<input type="checkbox"/> 50.73(a)(2)(iv) <input type="checkbox"/> 50.73(a)(2)(v) <input type="checkbox"/> 50.73(a)(2)(vi)(i)(A) <input type="checkbox"/> 50.73(a)(2)(vi)(i)(B) <input type="checkbox"/> 50.73(a)(2)(iv)

LICENSEE CONTACT FOR THIS LER (12):		TELEPHONE NUMBER:
NAME: T.P. Noonan, General Manager Nuclear Operations		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	MANUFACTURER	REPORTABLE TO NRRDS	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NRRDS	
X	B	A	S	P	T	X	X	X	X	N

SUPPLEMENTAL REPORT EXPECTED (14):	EXPECTED SUBMISSION DATE (15):	MONTH	DAY	YEAR
<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO				

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

On 7/9/91, it was determined that the Non Destructive Examination (NDE) surveillance requirements during the First Ten Year Inspection Interval was exceeded. Several longitudinal welds (LGW) on welded fittings in the Low Head and High Head Safety Injection, and the Residual Heat Removal Systems were excluded from the First Ten Year Interval NDE inservice inspection (ISI) program. The LGWs were not included on the isometric drawings used to formulate the NDE ISI program. An inadequate review of the piping spool piece drawings resulted in the incomplete isometric drawings. All required welds have been inspected. A review of original spool piece drawings was performed to verify required LGWs are included in the NDE ISI program. There were no safety implications as all of the inspected welds were acceptable.

As a result of a programmatic review of the ISI Program in response to this event, on 3/3/92, it was discovered that several supports on Class 3 equipment were not examined. The supports were not included on the drawings used to formulate the support program. Inspections of the supports were completed on 3/14/92. The inspection program for the Second Ten-Year Interval has been verified to include the required supports. There were no safety implications. The supports were examined and found acceptable. No degradations of structural integrity were identified.

LICENSEE EVENT REPORT (LER)  
TEXT CONTINUATION

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 300 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.

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

DESCRIPTION OF EVENT

On 6/12/91, with the Unit in Cold Shutdown (Operating Mode 5) at the end of the Eighth Refueling Outage, a Quality Assurance auditor, based on a field observation, questioned if several longitudinal welds in the Low Head Safety Injection (LHSI) System piping were examined as required by the site Non Destructive Examination (NDE) inservice inspection program. A review of the LHSI piping drawings and the inservice inspection program was implemented. On 6/18/91, it was determined that full compliance to the American Society of Mechanical Engineers (ASME) Section XI Non Destructive Examination (NDE) requirements during the First Ten Year Inspection Interval had not been met for these longitudinal welds. Per ASME Section XI (74S75), a sampling of the total number of longitudinal welds in fittings required volumetric examination during the First Ten Year Inspection Interval, which expired on 2/26/88. A review of original fabrication documentation revealed that seventy-six (76) longitudinal welds (of which 45 were in fittings) in a portion of the Class 2 piping in the LHSI System had been excluded from the NDE inservice inspection drawings, and therefore they were not inspected during the first ten year inspection interval. The affected portion of the LHSI system included the Class 2 section of the pump suction from the refueling water storage tank, pump suction from the containment sump, and the LHSI pump discharge to the High Head Safety Injection Pumps.

An operability assessment of the excluded fittings was performed and the subject lines were determined to be structurally sound and functionally operable. Based on the operability assessment, and the fact that compliance with the present Second Ten Year Interval had not been compromised, it was determined that transitions to higher operating modes were permissible and the longitudinal fitting welds would be scheduled for examination. The Unit entered Hot Shutdown (Operating Mode 4) on 6/27/91 at 1616 hours, and Hot Standby (Operating Mode 3) on 6/29/91 at 1830 hours. Following discovery of a leaking thermocouple conoseal on the reactor vessel head, the Unit was returned to Cold Shutdown on 7/04/91 at 0205 hours. After leaks were repaired the Unit entered Hot Shutdown at 1759 hours on 7/08/91.

LICENSEE EVENT REPORT (LER)  
TEXT CONTINUATION

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 520 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE RECORDS AND REPORTS MANAGEMENT BRANCH (P-630), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20545, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

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

On 7/09/91, as a result of further investigations, the LHSI piping was declared inoperable and Technical Specification (TS) 3.5.3 required a plant cooldown to Cold Shutdown within the next 20 hours. Since the required inspections were not expected to be completed within the next 20 hours, a cooldown to Cold Shutdown was completed at 1327 hours on 7/09/91. The Nuclear Regulatory Commission was notified of the plant shutdown at 1328 hours in accordance with 10CFR50.72.b.1.i.A "the initiation of any nuclear plant shutdown required by the plant's Technical Specifications".

The review of piping fabrication documentation continued. It included a review of the fabricator's spool piece drawings and Component Certified Mill Test Reports (CMTR) supplied during plant construction. This review identified additional longitudinal fitting welds in the Residual Heat Removal (RHR) System and the High Head Safety Injection (HHSI) System that were not inspected. The affected portion of the RHR system included the RHR pump discharge to the RHR return isolation valves. The affected portion of the HHSI system included the HHSI pump suction from the LHSI pumps. The required number of fitting welds in each system (eight LHSI, eight HHSI, and ten RHR) were examined per ASME Section XI. The inspections were completed on 7/12/91 at 1200 hours, with no defective welds present.

One of the corrective actions generated from this event was a programmatic review of the ISI Program to identify any other discrepancies. This review identified, on 3/13/92, that several supports on Class 3 equipment were not examined in accordance with the ASME Section XI requirements. These supports were located on the following systems: Auxiliary Feedwater System, River water System, Fuel Pool Cooling and Purification System, Reactor Plant Component Cooling Water System, Quench Spray System, and the Neutron Shield Tank Cooling System.

#### CAUSE OF THE EVENT

A field investigation by a Quality Assurance auditor identified welds that were not specified in the NDE inservice inspection program. A subsequent investigation revealed that additional longitudinal welds in fittings had not been included on the piping drawings used to develop the First Ten Year NDE Inservice Inspection Program, and thus the required number of longitudinal welds in fittings were not inspected during the First Ten Year Inspection Interval. In 1984, the information contained in original plant construction drawings and documentation, which was utilized to formulate the First Ten Year Interval Inservice

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 20555, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

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

Inspection Program, was consolidated on a new series of ISI isometric drawings formatted for ISI purposes. Since the isometric drawings for plant construction did not identify longitudinal welds in fittings made by the piping component manufacturer or spool piece fabricator, they had not been included on the new ISI isometrics and thus had not been included in the First Ten Year Interval NDE inservice inspection program. An inadequate review of the spool piece drawings and associated CMTRs, supplied by the piping fabricator during plant construction, resulted in the development of isometric drawings that did not account for longitudinal welds made during component manufacture. While not diagrammatically depicted on the fabricator spool piece drawings, the spool piece drawings do generally contain detailed descriptions and specifications of the pipe spool components on the bill of materials. From the information contained in the spool piece drawing bill of material, combined with a review of the associated piping Component Certified Mill Test Report documentation, it was possible to identify those piping components containing longitudinal welds. It was evident from the CMTR information that original construction code NDE requirements (100% X-ray of all longitudinal welds) had been completed by the fabricator.

An operability determination was made when the First Ten Year Interval inservice inspection frequency for the longitudinal welds was initially discovered to have been exceeded. A similar operability assessment was performed in response to LER 91-009-00 on several systems that were not hydrostatically tested in accordance with ASME Section XI to prove operability.

Based on the assessments performed as a result of LER 91-009-00, and since compliance to the present Second Ten Year Interval was not compromised, it was determined that an operability assessment was all that was required to prove operability of the LHSI system, and the identified fitting welds could be inspected at a future date during power operation. Although the operability assessment deemed the fittings as operable, it was later determined that such an assessment may not have been in strict compliance with Technical Specifications in regards to the First Ten Year Interval, and that operability should have been verified by examination prior to plant heatup. Compliance to the present Second Ten Year Interval ASME Section XI code of record (1983 edition, S 1983 addenda) and the Technical Specifications in regards to this Second Ten Year Interval was not compromised.

The cause for the missed surveillance involving the supports was incomplete vendor-supplied drawings/sketches of the systems. The supports were not included on the drawings used to formulate the

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TEXT CONTINUATION

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 600 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE RECORDS AND REPORTS MANAGEMENT BRANCH (P-330), 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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TEXT (if more space is required, use additional NRC Form 366A's) (17)

support inspection program. It is believed that the vendor either generically looked the Class 3 equipment supports or misinterpreted the A. code. A review of the vendor supplied information by utility personnel also failed to identify the deficiency in the support examination program.

CORRECTIVE ACTIONS

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

- 1). Prior to re-entry into Hot Shutdown, the required number of longitudinal fitting welds were examined to comply with the sampling requirements of ASME Section XI (74S75). No structural defects were present in the welds.
- 2). A review of all Class 1 and 2 piping that requires NDE inservice inspection and have the possibility of containing longitudinal welds was conducted. This included a detailed review of each spool piece drawing and when necessary, associated piping Component Certified Mill Test Reports, to determine if longitudinal welds were present and included in the NDE inservice inspection program.
- 3). A programmatic review of the NDE inservice inspection program has been initiated to further ensure that all relevant fabrication and construction documentation has been adequately reviewed and included in the inservice inspection program. Piping walkdowns will be conducted to supplement this review if determined to be necessary.
- 4). A similar detailed review of fabrication and manufacturing documentation for Beaver Valley Unit 2 will be initiated. If any relevant deficiencies are identified, the Unit 2 First Ten Year Interval program will be appropriately revised.
- 5). A root cause analysis of this event is being performed which may identify additional corrective actions, as necessary.
- 6). All accessible identified supports on the appropriate systems have been examined. No degradations of structural integrity have been identified.



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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-630), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20545, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

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7. The Second Ten-Year Inspection Interval Plan was verified to contain the examination requirements for the supports for Class 3 equipment.
8. A "Basis for Continued Operation" has been generated to address the unaccessible supports on the Neutron Shield Tank Cooling System.

PREVIOUS OCCURRENCES

There was one previous similar event involving Residual Heat Removal System welds excluded from the NDE inservice inspection program. These welds were identified through a Safety System Functional Evaluation (SSFE) and the inspections were performed during the Seventh Refueling Outage. Additionally, LER 91-009-00 reported an event in which a portion of the Chemical and Volume Control System piping was not hydrostatically tested in accordance with ASME Section XI.

REPORTABILITY

Beaver Valley Unit 1 entered Hot Shutdown on 7/08/91 at 1758 hours prior to the inspections of the longitudinal fitting welds on the HHSI, LHSI and RHR systems. The HHSI and LHSI systems, which are required to be operable in Hot Shutdown, could not be considered operable prior to completion of the weld inspections, therefore entry into Hot Shutdown was in violation of Technical Specification 3.0.4, which permits operating mode escalation provided all the required equipment/systems are operable. Upon identification of the inoperable systems, the ACTION statement of Technical Specification 3.5.3 was entered. The required weld inspections could not be completed within the allotted time of the ACTION statement, therefore the Unit was placed in Cold Shutdown. Additionally, Technical Specification 3.4.10 requires the structural integrity of ASME Code Class 1, 2, and 3 components be maintained in accordance with Technical Specification 4.0.5. This written report is being submitted in accordance with 10CFR50.73.a.2.i.A, the completion of any nuclear plant shutdown required by Technical Specifications, and 10CFR50.73.a.2.i.B, as an event or condition prohibited by Technical Specifications. Technical Specification 4.0.5.a states "Inservice inspection of ASME Code Class 1, 2, and 3 components and inservice testing of ASME Code Class 1, 2, and 3 pumps and valves shall be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as required by 10CFR50, Section 50.55a(g), except where specific written relief has been granted by the Commission

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TEXT CONTINUATION

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 20545, AND TO THE PAPERWORK REDUCTION PROJECT (0180-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

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

pursuant to 10CFR50, Section 50.55a(g)(6)(i)". The required components were not examined in accordance with ASME Section XI for the First Ten Year Interval, and written relief from examination was not requested.

Technical Specification 3.4.10 requires the structural integrity of ASME Code Class 1,2 and 3 components be maintained in accordance with Technical Specification 4.0.5. This written report is being submitted in accordance with 10CFR50.73.a.2.i.B, as an event or condition prohibited by Technical Specifications. Technical Specification 4.0.5.a states "Inservice inspection of ASME Code Class 1,2, and 3 components shall be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as required by 10CFR50, Section 50.55a(g), except where specific written relief has been granted by the Commission pursuant to 10CFR50, Section 50.55a(g)(6)(i)". The required components were not examined in accordance with ASME Section XI for the First Ten-Year Interval, and written relief from examination was not requested.

SAFETY IMPLICATIONS

There were no safety implication to the public as a result of this event. An operability assessment of the excluded fittings was performed and the subject lines were determined to be structurally sound and functionally operable. The Unit was placed in Cold Shutdown in accordance with Technical Specifications, and the required number of longitudinal welds were examined with no indications present. When the plant was in Cold Shutdown the affected systems were not used as part of the designated emergency boration flowpath.

There were no safety implication to the public as a result of the missed examinations. The examinations were performed within twenty-four (24) hours following discovery and no degradations of structural integrity of the supports were identified.