TOLEDO EDISON

A Centerior Energy Company

EDISON PLAZA
300 MADISON AVENUE
TOLEDO, OHIO 43652-0001

AB-92-023
NP-33-92-003

Docket No. 50-346

License No. NPF-3

April 22, 1992

United States Nuclear Regulatory Commission Document Control Desk Washington, D. C. 20555

Gentlemen:

LER 92-003 Cavis-Besse Nuclear Power Station, Unit No. 1 Date of Occurrence - March 23, 1992

Enclosed please find Licensee Event Report 92-003, which is being submitted to provide 30 days written notification of the subject occurrence. This LER is being submitted in accordance with 10 CFR 50.73(a)(2)(i).

Very truly yours,

Louis F. Storz Plant Manager

Davis-Besse Nuclear Power Station

LFS/ed

Enclosure

cc: Mr. A. Bert Davis Regional Administrator USNRC Region III

> Mr. William Levis DB-1 NRC Sr. Resident Inspector

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APPROVED DMB NO 1/80-0104 EXPIRES 4/30/97

ESTIMATED BURDEN PER RESPOND TO CISMPLY WTY THIS INFORMATION COLLECTION REQUEST 50.0 HRS FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE RECORDS AND REPORTS MANAGEMENT BRANCH IP 5301, U.S. NUCLEAR RESULATORY COMMISSION WASHINGTON DC 20558 AND TO THE PARENWORK REDUCTION PROJECT (3150-0104). OFFICE OF MANAGEMENT AND BUDGET WASHINGTON, DC 20503.

LICENSEE EVEN'T REPORT (LER)

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On March 23, 1992, it was discovered that Component Cooling Water (CCW) pump 2 was placed in service on March 19, 1992 without performing the deferred quarterly surveillance test (ST) for SW1434. Service Water (SW) loop 2 was declared inoperable and Technical Specification (TS) 3.7.4.1 was entered. CCW pump 3 was placed in service to exit TS 3.7.4.1. The ST for SW1434 was satisfactorily completed and CCW pump 2 was returned to service within four hours.

On March 31, 1992, a subsequent review of Inservice Test (IST) valves revealed that CCW pump 2 was placed in service on March 19 & 23, 1992 without performing the deferred quarterly reverse flow ST for check valve CC19. The missed ST for reverse flow testing CC19 would make CCW loop 2 inoperable if CCW pump 3 is placed in service for pump 2. Therefore, since CCW pump 2 was in service, TS 3.7.3.1 was not entered.

Programmatic controls were not adequate to ensure performance of deferred STs for IST valves.

Applicable system operating procedures will be revised by May 8, 1992 to ensure ST performance of IST valves. In addition, Licensed Operators will be trained on the IST program surveillance requirements of TS 4.0.5 by June 5, 1992.

NRC FORE: 388A

U.S. NUCLEAR REGULATORY COMMISSION

APPROVED OMB NO. 3150-0104 EXPIRES 4/30/92

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

ESTIMATED BURDEN PER RESPONSE TO COMPLY WTH THIS INFORMATION COLLECTION REQUEST 50.0 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE RECORDS AND REPORTS MANAGEMENT BRANCH IP-5301, U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20665. AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20803.

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Description of Occurrence:

On March 23, 1992 at 1310 hours, the Shift Supervisor discovered that CCW (CCW-CC) pump 2 was placed in service on March 19, 1992 without performing the deferred quarterly surveillance test (ST) DB-SP-03027 "Service Water System Quarterly Test Train 2 Valve Testing" for SW1434. Immediately, SW (SW-BI) loop 2 was declared inoperable and Technical Specification (TS) 3.7.4.1 was entered. The standby CCW pump 3 was placed in service to exit TS 3.7.4.1. The ST for SW1434 was satisfactorily completed and CCW pump 2 was returned to service within 4 hours (see page 5 for simplified system configuration drawing).

On March 31, 1992, a subsequent review of IST valves revealed that CCW pump 2 was placed in service on March 19 & 23, 1992 without performing the deferred quarterly ST (DB-SP-03067 "Component Cooling Water Pump 3 Quarterly Test") for check valve CC19. Since CCW pump 2 had been placed back in service on March 23, 1992, a decision was made not to perform the ST until CCW pump 3 is in service as CCW pump 2. The missed ST for reverse flow testing of CC19 would make CCW loop 2 inoperable if CCW pump 3 is placed in service for pump 2. Therefore, since CCW pump 2 was in service, TS 3.7.3.1 was not entered.

The missed surveillances of SW1434 and CC19 are reportable under 10CFR50.73(a)(2)(i)(B) as conditions prohibited by the Technical Specifications.

Apparent Cause of Occurrence:

The original ST due dates for CC19 and SW1434 were January 28 and February 22, 1992, respectively. The Inservice Test (IST) program allowed deferral of DB-SP-03067 and DB-SP-03027 until CC19 and SW1434 were removed from service. The IST program requires testing Category A and B valves at least once every three months, unless such operation is not practical during plant operations. However, testing of in-service IST valves must be performed at the next opportunity and prior to their return to service. On March 15, 1992 CCW pump 2 was removed from service for required maintenance and returned on March 19, 1992 at 1202 hours without performing the STs.

The deferred ST for SW1434 was included on the Critical Surveillance Test Report (USTR), but the control room shift turnover procedure (DB-OP-00100) did not require the Shift Supervisor and/or Assistant Shift Supervisor to review the CSTR. In addition, the computerized ST tracking system that provides input to the CSTR did not reflect the unique individual ST requirements for CC19.

The Operations procedures and tracking system that govern the performance of STs are structured for standard Davis-Besse TS surveillance requirements. They did not adequately account for the unique feature of the IST program that allows ST deferrals.

NRC FORM 386A

U.S. NUCLEAR REGULATORY COMMISSION

APPROVED OMB NO. 3150-0104

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

E-TIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST 80.0 HRS FORWARD COMMENTS REGARDING BURDEN ESCIMATE TO THE RECORDS AND REPORTS MANAGEMENT BRANCH IP-5301, U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20565, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGEY, WASHINGTON, DC 20503.

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Analysis of Occurrence:

The safety function of SW1434 is to provide adequate SW flow through CCW Heat Exchanger 2 after a Safety Features Actuation System (SFAS-JE) Level 2 event. Service Water Valve SW1434 was satisfactorily tested on March 23, 1992. The safety significance of this event was minimized since at least two SW and CCW loops were available throughout the events described in this LER. Therefore, operable flowpaths were available at all times.

The safety function of CC19 is to provide reverse flow protection for CCW Pump 2 and was previously tested in October 1991. Due to the missed ST, CC19 is currently inoperable for reverse flow protection from CCW pump 3, but does not render CCW loop 2 inoperable. However, TS 3.7.3.1 will be entered for a short duration if CCW pump 3 is placed into service until either CC19 is tested or CCW pump 2 is isolated.

A review of additional IST valves revealed compliance with their surveillance requirements.

Corrective Action:

An Operations Information Tag on the CCW pump 3 control switch and the Inoperable Equipment Tracking Log are being used to identify that if CCW pump 3 is placed in service for CCW pump 2, then TS 3.7.3.1 will be entered until CC19 is tested or CCW pump 2 is isolated. Since a transfer of CCW pumps during power operation causes a minor thermal transient on the Reactor Coolant Pump seals, DB-SP-03067 will continue to be deferred for CC19 until CCW pump 3 is required for service on loop 2.

A review was performed to identify all IST valves allowed to be deferred. This review identified that the testing requirements for the IST valves were adequate; with the exception of valves CC17, CC18, and CC19. The computerized ST tracking system has been revised to include the testing requirements for these three valves.

The following procedures will be revised by May 8, 1992 to include preoperational checks of surveillance requirements for their associated IST valves:

Procedure	Title
DB-OP-06261	Service Water System Operating Procedure
DB-OP-06262	Component Cooling Water System Procedure
DB-0P-06233	Auxiliary Feedwater System

NRC FORM 366A (6-89) U.S. NUCLEAR REGULATORY COMMISSION

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

APPROVED DMB NO. 3152 0104 EXPIRES 4/30/92

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST 500 HRS FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE RECORDS AN'S SEPCRIS MANAGEMENT BRANCH (P.530). U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 2055S. AND TO THE PAPERWOXX REDUCTION PROJECT (3150-0104). OFFICE OF MANAGEMENT AND BUDGET WASHINGTON, DC 20503.

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Corrective Action (Continued):

Training will be provided to the Licensed Operators by June 5, 1992 on the IST program surveillance requirements of TS 4.0.5.

Failure Data:

Previous failures to perform STs have been documented in LERs, but none were attributed to inadequate procedures for unique IST surveillance requirements specified by TS 4.0.5.

NP 33-92-003

PCAQR No. 92-0131

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

ESTIMATED GURDEN PEG RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST 50.0 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE 10 THE RECURDS AND REPURTS NANAGEMENT BRANCH (P-501). 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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