

New Hampshire Yankee

Ted C. Feigenbaum
President and
Chief Executive Officer

NYN- 92055

April 24, 1992

United States Nuclear Regulatory Commission
Washington, D.C. 20555

Attention: Document Control Desk

Reference: Facility Operating License No. NPF-86, Docket No. 50-443


Subject: Facility Operating Report (LER) 92-04-00: Non-compliance with Technical
Specification Surveillance Requirements

Gentlemen:

Enclosed please find Licensee Event Report (LER) No. 92-04-00 for Seabrook Station. This submittal documents an event which occurred on March 25, 1992, and is being reported pursuant to 10 CFR 50.73(a)(2)(i).

Should you require further information regarding this matter, please contact Mr. James M. Peschel, Regulatory Compliance Manager at (603) 474-9521, extension 3772.

Very truly yours,

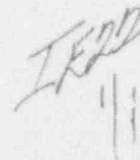

Ted C. Feigenbaum

TCF:MDO/ss

Enclosures: NRC Forms 366, 366A

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PDR ADOCK 05000443
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United States Nuclear Regulatory Commission
Attention: Document Control Desk

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cc: Mr. Thomas T. Martin
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Mr. Gordon E. Edison, Sr. Project Manager
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Washington, DC 20555

Mr. Noel Dudley
NRC Senior Resident Inspector
P.O. Box 1149
Scabrook, NH 03874

INFO
Records Center
1100 Circle 75 Parkway
Atlanta, GA 30339

LICENSEE EVENT REPORT (LER)

FACILITY NAME (1) **Seabrook Station** DOCKET NUMBER (2) **05000443** PAGE (3) **1 OF 03**

TITLE (4) **Missed Technical Specification Surveillance Requirement**

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	
03	25	92	29	2	004	000	42	49	2	DOCKET NUMBER(S) 050000

OPERATING MODE (9) **1**

POWER LEVEL (10) **11010**

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"/> 20.408(e)	<input type="checkbox"/> 50.73(a)(2)(iv)	<input type="checkbox"/> 73.71(b)
<input type="checkbox"/> 20.405(a)(1)(i)	<input type="checkbox"/> 50.36(a)(1)	<input type="checkbox"/> 50.73(a)(2)(v)	<input type="checkbox"/> 73.71(a)
<input type="checkbox"/> 20.405(a)(1)(ii)	<input type="checkbox"/> 50.36(a)(2)	<input type="checkbox"/> 50.73(a)(2)(vi)	<input type="checkbox"/> OTHER (Specify in Abstract below and in Text, NRC Form 366A)
<input type="checkbox"/> 20.406(a)(1)(i)	<input checked="" type="checkbox"/> 50.73(a)(2)(iii)	<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 **James M. Peschel - Regulatory Compliance Manager, extension 3772** TELEPHONE NUMBER **603474-9521**

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

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPROS	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPROS

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 March 25, 1992 it was determined that a discrepancy existed with the manner in which valve closure stroke time testing was being performed for 20 Valcor solenoid operated valves. The specific deficiency was that the closed position indicating light that was used to indicate the completion of valve travel during closure stroke time testing was actuated by the open limit switch. This means that the closure stroke time test only measured the interval from control switch initiation to "valve not full open" instead of the required interval from control switch initiation to the end of the actuating cycle. The improper method for stroke time measurement represents missed surveillance testing required by Surveillance Requirement 4.0.5 for Technical Specifications 3.6.3 "Containment Isolation Valve;" and Technical Specification 3.4.11, "Reactor Coolant System Vents". The subject valves include 19 Containment Isolation Valves (CIV) [JM] and the Reactor Vessel Head Vent [AB] [VTV].

Accurate and satisfactory stroke times were obtained on March 25, 1992 for the 19 Containment Isolation Valves [JM] by utilizing status monitoring lights to indicate valve closure. These lights will be utilized for future valve timing. Alternate testing methods for the Reactor Vessel Head Vent [AB] [VTV] were approved by the NRC on April 9, 1992 and testing was completed on April 13, 1992. These interim measures will be used until design changes can be made to the valve to accommodate closure timing.

At the time of the event the plant was in MODE 1.

There were no adverse safety consequences as a result of this event. This is the first event of this type at Seabrook Station.

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

FACILITY NAME (1) Seabrook Station	DOCKET NUMBER (2) 0 5 0 0 0 4 4 3 9 2	LER NUMBER (3)			PAGE (3)		
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER			
			0 0 4	0 0 0	2 OF	0 3	

TEXT (if more space is required, use additional NRC Form 3054's) (17)

On March 25, 1992 it was determined that a discrepancy existed with the manner in which valve closure stroke time testing was being performed for 20 Valcor solenoid operated valves. The specific deficiency was that the closed position indicating light that was used to indicate the completion of valve travel during closure stroke time testing was actuated by the open limit switch. This means that the closure stroke time test only measured the interval from control switch initiation to "valve not full open" instead of the required interval from control switch initiation to the end of the actuating cycle. The improper method for stroke time measurement represents missed surveillance testing required by Surveillance Requirement 4.0.5 for Technical Specifications 3.6.3 "Containment Isolation Valves" and Technical Specification 3.4.11, "Reactor Coolant System Vents". The subject valves include 19 Containment Isolation Valves (CIV) [JM], which isolate the Containment Building during accident conditions, and the Reactor Vessel Head Vent [AB] [VTV] which is used to vent non-condensable gases from the Reactor Vessel Head during accident conditions.

Technical Specification 3.6.3, "Containment Isolation Valves" requires each CIV to be OPERABLE, in MODES 1-4, with isolation times less than or equal to the required isolation times and that the isolation time shall be determined to be within its limit when tested pursuant to Technical Specification 4.0.5. Specification 4.0.5 specifies the requirements for inservice inspection and testing of ASME code class 1, 2, and 3 components.

Technical Specification 3.4.11, "Reactor Coolant System Vents" requires that the Reactor Vessel Head Vent be OPERABLE in MODES 1-4. As this valve is a ASME code class 2 component it must also be tested pursuant to Technical Specification 4.0.5.

Contrary to the above requirements these valves were not adequately stroke timed in the closed direction. This condition constitutes missed Technical Specification Surveillance Requirements and is therefore reportable per 10CFR50.73 (a)(1)(R).

All of the affected valves are currently OPERABLE as discussed below.

Further investigation revealed that for the 19 CIVs, a valid full closure indication was available by using annunciator light (UL) status lights. These lights are intended to provide a rapid verification of containment isolation to control room operators in the event of an accident. By performing the closure stroke time test for the CIVs and timing the interval from control switch actuation to UL status light illumination a valid stroke time can be obtained for the valves. The CIVs were satisfactorily stroke timed utilizing the UL status monitoring lights and operability was restored on March 25, 1992.

Interim relief from the requirement to time the closure of the Reactor Vessel Head Vent has been granted by the NRC in "Seabrook- Interim Relief From Inservice Testing (IST) of Reactor Vessel Head Vent Valve RC-FV-2881 (TAC No. M83091)" (see attached). In lieu of timing the closure of the valve, alternative testing has been performed and will continue to be performed on a quarterly basis to verify the continued operational readiness of the Reactor Vessel Head Vent Valve. This valve was restored to operable status on April 13, 1992.

ROOT CAUSE

The root cause of this event is attributable to design and testing inadequacies on Valcor solenoid valves with the "closed" position indicating light being actuated by an "open" limit switch and test procedures failing to recognize this condition.

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

FACILITY NAME (1) Seabrook Station	DOCKET NUMBER (2) 0500044392	LER NUMBER (6)			PAGE (3)	
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER		
			004	0	03	OF

TEXT (if more space is required, use additional NRC Form 388A's) (17)

CORRECTIVE ACTION

NHY will perform the following corrective actions in response to this event:

1. A design change will be implemented during the next refueling outage to provide closed position indication for the Reactor Vessel Head Vent.
2. The current design requirements for all solenoid operated valves in the IST program will be evaluated and, if deemed necessary, design changes to the valve position indicating circuits will be implemented by November 1, 1992.
3. NHY will implement procedure changes by April 30, 1992 requiring the use of UL lights for slave relay testing and for stroke timing for the 19 CIV's.

SAFETY EVALUATION

There were no adverse safety consequences as a result of this event. All 19 CIVs were satisfactorily stroke timed closed utilizing the UL status lights to provide closed valve indication. The Reactor Vessel Head Vent has been and will continue to be tested by alternative methods to verify its continuing operational readiness. This alternative testing has been approved by the NRC in "Seabrook Interim Relief From Inservice Testing (IST) of Reactor Vessel Head Vent Valve RC-FV-2881 (TAC No. M83091)".

PREVIOUS OCCURRENCES

This is the first event of this type at Seabrook Station. At the time of the event the plant was in MODE 1.