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May 4, 1992
ND3MNO:3294

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

LER 92-005-00

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

Gentlemen:

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

LER 92-005-00, 10 CFR 50.73.a.2.i.B, "Missed Surveillance of River Water Valve for Component Cooling Water Heat Exchangers".

Very truly yours,

T. P. Noonan
General Manager
Nuclear Operations

JGT/njm

Attachment

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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 20585, 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 (4) 0 5 0 0 0 3 3 4 1	PAGE (3) 1 OF 0 4
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TITLE (4)
Missed Surveillance of River Water for Component Cooling Water Heat Exchangers

EVENT DATE (5)			LER NUMBER			REPORT DATE (7)			OTHER FACILITIES INVOLVED (8)	
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	MONTH	DAY	YEAR	FACILITY NAMES	DOCKET NUMBER(S)
0 4	0 2	9 2	9 2	0 0 5	0 0	0 5	0 4	9 2	N/A	0 5 0 0 0
THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR 5. (Check one or more of the following) (11)										

OPERATING MODE (9) 1	20.402(b)	20.405(c)	50.73(a)(2)(iv)	73.71(b)
POWER LEVEL (10) 1 0 0	20.405(a)(1)(ii)	50.36(c)(1)	50.73(a)(2)(v)	73.71(c)
	20.405(a)(1)(iii)	50.36(c)(2)	50.73(a)(2)(vi)	OTHER (Specify in Abstract below and in Text, NRC Form 366A)
	20.405(a)(1)(iv)	X 50.73(a)(2)(i)	50.73(a)(2)(vii)(A)	
	20.405(a)(1)(v)	50.73(a)(2)(ii)	50.73(a)(2)(vii)(B)	
	20.405(a)(1)(vi)	50.73(a)(2)(iii)	50.73(a)(2)(ix)	

LICENSEE CONTACT FOR THIS LER (12)

NAME T.P. Noonan, General Manager Nuclear Operations	TELEPHONE NUMBER 4 1 2 6 4 3 - 1 2 5 8
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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
A	B	S	X X X X	X X X X	N				

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 4/2/92 the unit was in Power Operation at 100 percent reactor power. A Quality Services Auditor, verifying audit responses, reported that the component cooling water heat exchanger outlet valve, RW-645, was not locked. The Technical Specifications require verifying this valve is in its correct position every month unless locked. The Operations Staff reviewed station documents to determine when RW-645 position was last verified. This review found the River Water (RW) system monthly valve position verification surveillance procedure had been revised to delete the check of RW-645. The verification should have been included in another surveillance procedure which verified the position of locked valves and the acceptable condition of their locking devices. However, the locked valve verification procedure was never revised to include RW-645. This resulted in RW-645 last being verified open on 6/24/91. Since RW-645 had not been verified open since 6/24/91, the plant had failed to perform a Technical Specification Surveillance Requirement for eight months. Although the local position verification of RW-645 was not performed, inadvertent closure of the valve would have caused system flow and pressure annunciation in the control room.

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST 500 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATES 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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		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER		
		9 2	- 0 0 5	- 0 0	0 2	OF 0 4

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

DESCRIPTION OF EVENT

A Safety System Functional Evaluation (SSFE) was conducted between February 1 and May 15, 1989 on the River Water System. This review noted inconsistencies between the Operating Manual's Normal System Arrangement (NSA), and the actual in-plant valve position for valve RW-645. The actual valve position was "Locked Open." The NSA position was "Open" (not locked). In response to this observation, procedural changes were initiated to revise the Operating Manual and Operations Surveillance Tests to reflect actual valve position. This valve was to be deleted from Operations Surveillance Test (OST) 1.30.13B, "R.P. River Water System B - Header Valve Position Verification" and added to OST 1.48.7 "Padlock Quarterly Review".

However, as an immediate response to the SSFE Observation and prior to initiating these changes, the on-duty shift supervisor had the locking device removed from RW-645 to reflect the Operating Manual's NSA position and the periodic valve position surveillance requirement was satisfied by OST 1.30.13B.

On 7/12/91, OST 1.30.13B was revised with RW-645 deleted to respond to the SSFE audit, but OST 1.48.7 and the operating manual were not revised. This went undetected until 4/22/92 when a Quality Services Auditor found RW-645 open, but unlocked.

The auditor, who was verifying that the actions initiated by the SSFE were in place, questioned why valve RW-645 was not locked open and verified by OST 1.48.7. Operations immediately verified that RW-645 was open and revised OST 1.30.13B to include verifying this valve open on a monthly frequency. Station documents were also reviewed to determine when RW-645 valve position was last verified. The document review indicated RW-645 was last verified open on 6/24/91.

Technical Specification Surveillance Requirement 4.7.4.1.b requires that River Water valves that service safety related equipment and are not locked, sealed, or otherwise secured in position be verified in their correct position monthly. In addition, the Updated Final Safety Analysis Report (FSAR) requires locked valves be verified in their correct position quarterly. Contrary to this the Component Cooling Water Heat Exchanger Outlet Valve, RW-465, was not verified in its correct position since 6/24/91.

This missed Surveillance Requirement was due to the valve being deleted from Operations Surveillance Test (OST) 1.30.13B, "R.P. River Water System B - Header Valve Position Verification" and not added to OST 1.48.7 "Padlock Quarterly Review" when responding to an internal Duquesne Light Safety System Functional Evaluation (SSFE) Observation.

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 20502.

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

CAUSE OF EVENT

This event was due to personnel error in deleting RW-645 from the monthly River Water valve position verification OST, prior to incorporating it into the locked valve surveillance test.

CORRECTIVE ACTIONS

The following corrective actions have been taken because of this event:

1. The Updated Final Safety Analysis Report drawings were reviewed to ensure no locking device is required on RW-645.
2. RW-645 was verified in its correct position (open).
3. OST 1.30.13B was immediately revised to include the valve position verification Surveillance Requirement.
4. This LER will be reviewed by the Procedures Group to emphasize the appropriate use of the Operating Manual Change Notice (OMCN) for immediate surveillance changes and the importance of coordinating interrelated procedure revisions.

REPORTABILITY

This report is being submitted in accordance with 10CFR50.73.a.2.i.B as a condition prohibited by the plant's Technical Specifications since Technical Specification Surveillance Requirement 4.7.4.1.b was missed.

SAFETY IMPLICATIONS

There were no safety implications of this event. RW-645 was found in the required open position. Both the Reactor Plant River Water and the Primary Plant Component Cooling Systems remained operable throughout this event.

Additionally, if RW-645 would have been inadvertently closed, this condition would only affect The "B" train of River Water and Reactor Plant Component Cooling and could be detected by Component Cooling System temperature and pressure alarms and River Water flow alarms. The "A" train of both systems would have remained fully operable.

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-830), 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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		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER		
		9 2	0 0 5	0 0	0 4	OF 0 4

TEXT (If more space is required, use additional NRC Form 306A's) (17)

Previous Similar Events

Review of station documents show the following previously reported similar missed surveillance event due to a surveillance requirement being inadvertently deleted from an CST:

LER 91-014, "Technical Specification Surveillance Testimony Deficiency"; which involved the deletion of acceptance criteria from a surveillance test.