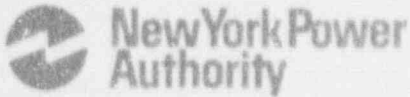


James A. FitzPatrick
Nuclear Power Plant
P.O. Box 41
Lycoming, New York 13093
315 342-3840



Harry P. Salmon, Jr.
Resident Manager

May 13, 1992
JAFP-92-0386

United States Nuclear Regulatory Commission
Document Control Desk
Mail Station P1-137
Washington, D.C. 20555

SUBJECT: DOCKET NO. 50-333
LICENSEE EVENT REPORT: 92-020-00 - Missed
Surveillance Classified as a
Non-Reportable Event Due to
Personnel Errors

Dear Sir:

This report is submitted in accordance with 10 CFR 50.73(a)(2)(i).

Questions concerning this report may be addressed to
Mr. W. Verne Childs at (315) 349-6071.

Very truly yours,

HARRY P. SALMON, JR.

HPS:WVC:lar

Enclosure

cc: USNRC, Region I
USNRC Resident Inspector
INPO Records Center

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LICENSEE EVENT REPORT (LER)

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-550), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20545, AND TO THE PAPERWORK REDUCTION PROJECT (150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

FACILITY NAME (1) James A. FitzPatrick Nuclear Power Plant DOCKET NUMBER (2) 0 5 0 0 0 3 3 3 1 OF 0 6 PAGE (3)

TITLE (4) Missed Surveillance Classified as a Non-Reportable Event Due to Personnel Errors

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)	
0	4	0	3	9	2	9	2	0	2	0	0	0
0	5	1	3	9	2	0	5	1	3	9	2	0

THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR 5 (Check one or more of the following) (11)

OPERATING MODE (9)	20.402(b)	20.406(a)	50.73(a)(2)(iv)	73.71(b)
POWER LEVEL (10) 0,0,0	20.406(a)(1)(i)	50.38(c)(1)	50.73(a)(2)(v)	73.71(c)
	20.406(a)(1)(ii)	50.38(c)(2)	50.73(a)(2)(vi)	OTHER (Specify in Abstract below and in Text NRC Form 306A)
	20.406(a)(1)(iii)	X 50.73(a)(2)(ii)	50.73(a)(2)(vii)(A)	
	20.406(a)(1)(iv)	50.73(a)(2)(i)	50.73(a)(2)(vii)(B)	
	20.406(a)(1)(v)	50.73(a)(2)(iii)	50.73(a)(2)(ix)	

LICENSEE CONTACT FOR THIS LER (12)

NAME: W. Verne Childs, Senior Licensing Engineer TELEPHONE NUMBER: 3 1 5 3 4 9 - 6 0 7 1

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

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NRC	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NRC

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-spaced typewritten lines) (16)

EIIS Codes are in []

The plant was shutdown and in the cold condition for maintenance and refuel. During a routine NRC inspection it was determined that resolution of a Quality Assurance Non-Conformance and Corrective Action (NCA) report written in December 1986 was inadequate. The NCA was initiated as a result of an apparent violation of primary containment [NH] drywell airlock surveillance requirements due to personnel errors. Resolution of the NCA did not properly classify the violation of the surveillance requirement as an event requiring a report under 10 CFR 50.73. Corrective action included revision of surveillance procedures and review of NCAs written since 1986 to verify adequate response and determination of corrective action to reduce the probability of recurrence. Plant staffing level and organizational changes will also result in consolidation of the related compliance, licensing, and reportability review process within one department.

LICENSEE EVENT REPORT (LER)
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, D. 20585, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104) OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

FACILITY NAME (1) James A. FitzPatrick Nuclear Power Plant	D. / (LET NUMBER (2)) 0 5 0 0 0 3 3 3	LER NUMBER (6)			PAGE (3)		
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER			
		9 2	- 0 2 0	- 0 0	0 2	OF	0 6

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

EIIS Codes are in []

Description

The plant was shutdown and in the cold condition for maintenance and refuel.

During an NRC Resident Inspector's evaluation of Safety Assessment and Quality Verification, it was determined that a Quality Assurance (QA) Department NCA (Non-Conformance and Corrective Action) report regarding a potential violation of Technical Specifications was not adequately resolved prior to closure of the NCA. A reevaluation by the New York Power Authority (the licensee) determined that there was a violation of Technical Specification Surveillance Requirement (TSSR) 4.7.A.2.e(3). The violation occurred in March 1986 and was not reported as required by 10 CFR 50.73.

The primary containment [NH] drywell personnel access airlock doors are each sealed with double resilient seals. Connections are provided to allow a Local Leakage Rate Test (LLRT) of the seals by pressurizing the volume between the seals. Connections are also provided to allow a leakage rate test of the entire airlock (including the door seals) by pressurizing the entire airlock.

Technical Specification Surveillance Requirement R) 4.7.A.2.e(3) requires test of the entire airlock: 1) every six mths, 2) prior to restoration of primary containment integrity following airlock maintenance which could affect sealing capability, and 3) within three days of opening the airlock when primary containment integrity is required and maintenance has been performed which could affect sealing capability.

Technical Specification Surveillance Requirement (TSSR) 4.7.A.2.e(4) also pertains to airlock leak rate testing and allows test of the door seals (rather than the entire airlock): 1) prior to restoration of primary containment integrity IF no maintenance which could affect sealing was performed, 2) within three days of opening the airlock when primary containment integrity is required, and 3) once every three days during periods of frequent openings of the airlock when primary containment integrity is required.

TSSR 4.7.A.2.e(4) is intended to demonstrate the leak tightness of the airlock by testing the door seals when no maintenance which could affect the sealing capability of the doors has been performed. Performance of airlock door seal test (rather than test of the entire airlock) is a relatively quick and simple procedure which results in less disruption of work activities within the drywell.

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST, 500 HRS. FORWARD COMMENT REGARDING BURDEN ESTIMATE TO THE RECORDS AND REPORTS MANAGEMENT BRANCH (R&M), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20545, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

FACILITY NAME (1) James A. FitzPatrick Nuclear Power Plant	DOCKET NUMBER (2) 0 5 0 0 0 3 3 3 9 2	LER NUMBER (8)			PAGE (3)	
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER		
		— 0 2 0	— 0 0	0 1 3	OF	0 6

TEXT (If more space is required, use additional NRC Form 366A's (117))

On March 14, 1986 the plant was shutdown and cooled down for a maintenance outage of approximately two weeks. During plant start-up on March 28, 1986, following the outage (and when primary containment integrity was required), personnel experienced difficulty in closing the inner door of the personnel airlock. Maintenance personnel adjusted the door, and on March 30, 1986 personnel attempted to perform a test of the door seals in accordance with TSSR 4.7.A.2.e(4). This test was not satisfactory because the door would not seal properly. Maintenance personnel again adjusted the door and corrected a deficiency associated with one of the door seals. The door seal had been slightly displaced from its normal location in a groove for a short distance. Subsequent testing of the door seals in accordance with TSSR 4.7.A.2.e(4) was satisfactorily completed at 0035 hours on March 31, 1986.

At this point in time the start-up and power ascension to rated power continued. Operations Department supervisory personnel reviewed documentation associated with the maintenance work on the inner airlock door and the surveillance which was conducted following the maintenance work. The personnel performing the surveillance and supervisory personnel that reviewed the surveillance did not consider a test of the entire airlock necessary because door adjustments and/or seal replacements (or seal repairs) were not considered to be "maintenance which could affect sealing capability" of the airlock door. Performance of a door seal leak test was considered to be a conservative test because both seals must be leak tight to obtain satisfactory results.

During portions of October and November 1986, the Quality Assurance Department conducted Audit 1142 which addressed drywell airlock surveillance. As a result of Audit 1142, which discovered that a test of the entire airlock was not conducted following the maintenance work on March 30, 1986, NCA-552 was issued on December 1, 1986. NCA-552 required corrective and preventive actions to: 1) evaluate reportability under 10 CFR 50.73 (LER system) and 2) action to bring the plant into compliance with TSSR 4.7.A.2.e(3).

The response to NCA-552 (dated December 8, 1986) indicated that the applicable surveillance test would be revised to require a test of the entire airlock in accordance with TSSR 4.7.A.2.e(3) following any airlock maintenance and documentation should be issued to evaluate reportability under 10 CFR 50.73.

On December 8, 1986 Occurrence Report 86-219 was written to initiate evaluation of the reportability under 10 CFR 50.73. PORC reviewed OR-86-219 on December 17, and 23, 1986 but deferred any decision on reportability under 10 CFR 50.73 until an interpretation of TSSRs 4.7.A.2.e(3) and (4) could be researched and documented. This course

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATIONESTIMATED 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-430), U.S. NUCLEAR
REGULATORY COMMISSION, WASHINGTON, DC 20545 AND TO
THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE
OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

FACILITY NAME (1) James A. FitzPatrick Nuclear Power Plant	DOCKET NUMBER (2) 0 6 0 0 0 3 3 3 9 2	LER NUMBER (6)			PAGE (8)	
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER		
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TEXT (if more space is required, use additional NRC Form 366A's) (17)

of action was taken because reportability hinged on the meaning of the TSSR wording which referred to "maintenance which could affect sealing capability" of the airlock.

A Technical Specification Interpretation was drafted to provide clarification and guidance concerning the wording in TSSR 4.7.A.2.e(3). The draft Technical Specification Interpretation was intended to define airlock door seal replacement as a maintenance activity which would not affect the sealing capability of the airlock by increasing leakage and thus, test of the entire airlock would not be required as a result of seal replacement. During the process of reviewing the draft Technical Specification Interpretation, concern was expressed that any maintenance activity which either reduced leakage or increased leakage would be interpreted as "maintenance which could affect sealing capability" and thus would violate the requirements of TSSR 4.7.A.2.e(3). As a result, the draft Technical Specification Interpretation was revised to allow test of the door seals (rather than test of the entire airlock) only when the airlock maintenance activities consisted of minor tasks such as cleaning, painting, or lubrication. The revised draft Technical Specification Interpretation was approved by PORC on May 25, 1987, approximately six months after NCA-552 was issued.

On July 9, 1987 (45 days after approval of the Technical Specification Interpretation concerning airlock maintenance) PORC again reviewed OR-86-219 and determined that the failure to test the entire airlock on March 30, 1986 (after maintenance activities which adjusted the inner door and repaired one door seal) was not reportable under 10 CFR 50.73. This decision by PORC was contrary to the position expressed in the Technical Specification Interpretation.

During the period of February 2, 1992 to March 7, 1992 the Resident NRC Inspectors reviewed the actions and documentation associated with closure (resolution) of a number of NCAs. Based on this review, the NRC Inspector concluded that a test of the entire airlock was required by Technical Specifications and that NCA-552 was not adequately resolved prior to closure. The NRC Inspector also considers the circumstances described in NCA-552, and the July 1987 PORC classification of OR-86-219 as an event which did not constitute a 10 CFR 50.73 reportable condition, to be an unresolved item (Item 92-01-01).

Based on NRC Inspection 92-01, OR-92-137 was written on April 13, 1992 to reevaluate OR-86-219. PORC determined on April 21, 1992 that the resolution of NCA-552 and OR-86-219 between December 1, 1986 and

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-330), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20545, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

FACILITY NAME (1) James A. FitzPatrick Nuclear Power Plant	DOCKET NUMBER (2) 0 5 0 0 0 3 3 3	LER NUMBER (3)			PAGE (3)	
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER		
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TEXT (if more space is required, use additional NRC Form 366A's) (17)

July 9, 1987 was inadequate in that the failure to test the entire airlock on March 30, 1986 should have been classified as an event which required submittal of an LER under 10 CFR 50.73.

Cause

The event was caused by personnel errors (Cause Code A).

The Operations Department supervisory personnel did not consider it necessary to perform a leakage rate test of the entire airlock following maintenance on the door and door seals. A test of the door seals demonstrates that the maintenance did not degrade the door sealing capability.

The apparent cause of the Plant Operating Review Committee personnel errors in not classifying the event as a 10 CFR 50.73 reportable event was a misunderstanding of TSSR 4.7.A.2.e(3) and the lack of a timely review of OR-86-219.

The date of the initial event was March 30, 1986. NCA-552, which documented discovery of the deficiency, was issued eight months later on December 1, 1986. Occurrence Report (OR) 86-219 was written on December 8, 1986 in response to NCA-552 and to initiate review of the event for reportability under 10 CFR 50.73. As discussed in the event description, PORC did not complete review of OR-86-219 until July 9, 1987. The considerable time delay between initiation of OR-86-219 and final review (seven months) and the time delay between approval of the Technical Specification Interpretation and final review of OR-86-219 (six weeks) probably contributed to the error.

Analysis

The event is considered to be a violation of TSSR 4.7.A.2.e(3) because a test of the entire airlock was not conducted following the maintenance work on March 30, 1986. As a result, the event is reportable under 10 CFR 50.73(a)(2)(i); that is, an operation prohibited by the plant Technical Specifications.

The event was not safety significant. Testing of the door seals (rather than the entire airlock) following adjustment of the door and repair of a door seal would reveal a door sealing capability deficiency because leakage of either seal on a door will be detected.

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 800 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) James A. FitzPatrick Nuclear Power Plant	DOCKET NUMBER (2) 0 5 0 0 0 3 3 3	LER NUMBER (6)			PAGE (3)		
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER			
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TEXT (if more space is required, use additional NRC Form 306A's) (17)

Testing of the entire airlock demonstrates structural integrity of the airlock, and the leak tightness of both seals on both the inner and outer doors. In addition, testing of the entire airlock demonstrates the leak tightness of the airlock penetrations, such as door handwheel shaft packings, which are not provided with connections to allow LLRT of the shaft packing.

Corrective Action

1. The applicable surveillance test procedures were revised to require a test of the entire airlock following any maintenance activity which could affect sealing capability of the airlock. Completed December 17, 1986.
2. The Quality Assurance Department has initiated a review of NCAs issued since 1986 to address NRC Inspection Item 92-01-01. Each NCA, and the associated response, will be evaluated to provide assurance that the identified deficiencies were properly evaluated to verify adequate response and corrective action for closure. Scheduled for completion prior to start-up from the 1992 Refuel Outage.
3. Recent plant organizational changes and the addition of plant staff personnel will result in the eventual consolidation of most of the "regulatory compliance" activities, event reportability review, Technical Specification Interpretation processing, and other licensing activities at the plant within the Operating Review Group/Licensing Department. This will result in a more focused and prompt review of potentially reportable events by a single department and reduce the probability of recurrence.

Additional Information

Failed Components: None

Similar Events: None