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10CFR50.73

TEDO

September 26, 1995

Docket No. 30-352 License No. NPF-39

U.S. Nuclear Regulatory Commission Attn: Document Control Desk Washington, DC 20555

> SUBJECT: Licensee Event Report Limerick Generating Station - Unit 1

This LER reports an Engineered Safety Feature actuation after the Reactor Core Isolation Cooling (RCIC) system isolated, due to a minor pressure fluctuation during a water flow transient in the RCIC system steam supply line, caused by a lack of procedural guidance.

Reference:	Docket No. 50-352
Report Number:	1-95-005
Revision Number:	00
Event Date:	August 27, 1995
Report Date:	September 26, 1995
Facility:	Limerick Generating Station
*	P.O. Box 2300, Sanatoga, PA 19464-
	2300

This LER is being submitted pursuant to the requirements of 10CFR50.73(a)(2)(iv).

Very truly yours, DMS:cah

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cc: T. T. Martin, Administrator Region I, USNRC N. S. Perry, USNRC Senior Resident Inspector, LGS

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On 08/27/95 at 2251 hours, during performance of System procedure S49.1.B, "Recovery from RCIC Steam Line Isolation and Resultant Turbine Trip," the Reactor Core Isolation Cooling (RCIC) system warmup bypass valve HV-049-1F076 was opened and the RCIC system isolated on a low steam supply line pressure signal. This is an Engineered Safety Feature actuation. The isolation was reset at 2256 hours, and the inboard Primary Containment isolation valve HV-049-1F007 and the warmup bypass valve HV-049-1F076 were reopened. Procedure S49.1.B was then satisfactorily completed without incident. The consequences of this event were minimal in that the unit was shutdown for an 8-day maintenance outage and the RCIC system was not required for operation. The inadvertent RCIC system isolation was caused by a minor pressure fluctuation during a water flow transient in the steam supply line. The cause of the water being present in the RCIC system steam supply line was caused by a lack of procedural guidance on draining the RCIC system steam supply line when the reactor is flooded up. Appropriate System procedures will be developed for the RCIC, High Pressure Coolant Injection, and Main Steam systems. Also, General Plant procedure GP-2 will be revised to address this event.

NRC FORM 366A U.S. NU (5-92)	CLEAR REGULATORY COMMISSION	APPROVED BY OMB NO. 3150-0104 EXPIRES 5/31/95				
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# Unit Conditions Prior to the Event

On August 20, 1995, Unit 1 had been shutdown for a planned 8-day maintenance outage to replace a failed fuel bundle. This outage required the reactor pressure vessel (RPV, EIIS:RPV) to be flooded up to the Main Steam system lines. On August 27, 1995, Unit 1 was in Operational Condition 2 (Startup), the RPV pressure was approximately 101 psig, and Operations personnel were performing the System (S) Operating Procedure S49.1.B, "Recovery from RCIC Steam Line Isolation and Resultant Turbine Trip." Unbeknownst to Operations personnel, water remained inside the RCIC system steam supply line as a result of the RPV flood up.

### Description of the Event

On August 27, 1995 at 2251 hours, during performance of procedure S49.1.B, the Reactor Core Isolation Cooling (RCIC, EIIS:BN) system warmup bypass valve HV-049-1F076 was opened and the RCIC system isolated on a low steam supply line pressure signal. This is an Engineered Safety Feature (ESF, EIIS:JC) actuation. A preliminary investigation concluded that the isolation was potentially caused by a minor pressure fluctuation during a water flow transient in the steam supply line. The isolation was reset at 2256 hours, and the inboard Primary Containment isolation valve HV-049-1F007 and the warmup bypass valve HV-049-1F076 were reopened. Procedure S49.1.B was then satisfactorily completed without incident.

A four hour notification was made to the NRC at 0148 hours on August 28, 1995, in accordance with the requirements of 10CFR50.72(b)(2)(ii) since this event resulted in an ESF actuation. This report is submitted in accordance with the requirements of 10CFR50.73(a)(2)(iv).

#### Analysis of the Event

The consequences of this event were minimal in that the unit was shutdown for an 8-day maintenance outage and the RCIC system was not required for operation. The RCIC system responded appropriately to the low steam supply line pressure signal and closed the associated isolation valves. Operations expeditiously reset the RCIC system isolation, thereby preventing any impact on other plant systems. Operations determined the isolation to be invalid since reactor pressure was 101 psig which is greater than the RCIC system isolation setpoint of  $\leq 64.5$  psig. There was no release of radioactive materials to the environment as a result of this event.

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LICENSEE EVENT REPORT TEXT CONTINUATION	(LER)	ESTIMATED BURDEN PER RESPONSE TO COMPLY THIS INFORMATION COLLECTION REQUEST: 50.0 FORWARD COMMENTS REGARDING BURDEN ESTIMAT THE INFORMATION AND RECORDS MANAGEMENT BR (MNBB 7714), U.S. NUCLEAR REGULATORY COMMISS WASHINGTON, DC 20555-0001, AND TO THE PAPE REDUCTION PROJECT (2150-0104), OFFICE MANAGEMENT AND BUGGET, WASHINGTON, DC 20503					
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### Cause of the Event

The inadvertent RCIC system isolation was caused by a minor pressure fluctuation during a water flow transient in the steam supply line. When the RCIC system warmup bypass valve was opened, water was sent through the steam supply line into the depressurized RCIC system steam piping. The pressure transmitters, PIS-49-1N658A, C, E, and G, which provide the isolation signal are located on the steam supply line. The water flow transient in the steam supply line was sensed by the pressure transmitters and resulted in the false low pressure signal.

The cause of the water being present in the RCIC system steam supply line was caused by a lack of procedural guidance on draining the RCIC system steam supply line following an unusual plant condition. In general, the RPV and cavity are flooded up during refueling outages when most systems, including RCIC, are also blocked out for maintenance. In bringing the plant back online following a refueling outage, systems such as RCIC are drained as part of clearance restoration instructions. During the planned 8-day maintenance outage, the RCIC system had not been blocked, and therefore, no clearance instructions existed for draining the system. As a result, the RCIC syster steam supply line contained water when Operations personnel opened the warmup bypass valve.

## Corrective Actions

- An S procedure will be developed for draining the RCIC system when the RPV is flooded up and an operational hydrostatic test is not required. Additionally, appropriate S procedures will be developed for the High Pressure Coolant Injection and the Main Steam systems. These procedures are expected to be developed by November 30, 1995.
- Procedure GP-2, "Normal Plant Startup," will be revised to include steps to verify that the RCIC, HPCI, and Main Steam system steam supply lines are drained following RPV flood up to the Main Steam system lines. This action is expected to be completed by November 15, 1995.

## Previous Similar Occurrences

None