ABSTRACT (Limit to 1400 speces, i.e., approximately fifteen single-spece typewritten lines) (18) Technical Specification Surveillance Requirement 4.7.3 requires that the correct position of all valves servicing safety-related equipment, which are not locked, sealed or otherwise secured in position, be verified every thirty-one days. On August 13, 1984, during a periodic audit of the Component Cooling System valve lineup, it was discovered that the Spent Fuel Pit Heat Exchanger Flow Control Valve (2CC37), which is a normally locked valve, was not locked as required. The routine surveillance is not performed on this valve because of its normally "locked" status. However, since the lock was inadvertently not reinstalled following a periodic flow adjustment, the requirements of Surveillance 4.7.3 were applicable. Upon discovery of the error, a lock was immediately installed on the valve. A review of applicable operating instructions revealed a technical discrepancy between the O.I. for the Component Cooling System and the O.I. for the Spent Fuel Pit Cooling System, concerning which valve should be throttled to adjust flow through the heat exchanger. The appropriate procedural changes will be made. This occurrence involved no undue risk to the health or safety of the public. However, due to not complying with the Surveillance Requirement for unlocked valves, the event is reportable in accordance with 10CFR 50.73(a)(2)(i)(B).

NO

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YES (If yes, complete EXPECTED SUBMISSION DATE)

IEZZI

MONTH

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YEAR

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

Salem Generating Station DOCKET NUMBER LER NUMBER PAGE Unit 2 05000311 84-020-00 2 OF 3

PLANT AND SYSTEM IDENTIFICATION:

Westinghouse - Pressurized Water Reactor

Energy Industry Identification System (EIIS) codes are identified in the text as [XX].

IDENTIFICATION OF OCCURRENCE:

Component Cooling System Valve Not Locked - Required Surveillance Not Performed

Discovery Date: 08/13/84

Report Date: 09/12/84

This report was initiated by Incident Report No. 84-124

CONDITIONS PRIOR TO OCCURRENCE:

Mode 1 - Rx Power 100 % - Unit Load 1130 MWe

DESCRIPTION OF OCCURRENCE:

On August 13, 1984, a periodic audit of the Component Cooling System [CC] valve lineup revealed that 2CC37 (Spent Fuel Pit Heat Exchanger Flow Control Valve), whose normal position is "Throttled and Locked", was not locked. A check of the Tagging Request and Inquiry System (TRIS) revealed that the valve position was last verified on January 28, 1984.

Technical Specification Surveillance Requirement 4.7.3 states:

At least two (2) component cooling water loops shall be demonstrated operable at least once per thirty-one (31) days by verifying that each valve (manual, power-operated or automatic) servicing safety-related equipment, that is not locked, sealed, or otherwise secured in position, is in its correct position.

Because 2CC37 is a normally locked valve, its position is not required to be verified by the performance of the routine surveillance procedure; but instead, is verified during system valve lineups prior to mode changes or following system maintenance activities. However, since the valve was inadvertently unlocked, Technical Specification Surveillance Requirement 4.7.3 applied.

APPARENT CAUSE OF CCCURRENCE:

2CC37 is used to set the flow through the Spent Fuel Pit Heat Exchanger, and is periodically adjusted. The lock was apparently not reinstalled following a flow adjustment of this valve.

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

Salem Generating Station Unit 2

DOCKET NUMBER 05000311 LER NUMBER 84-020-00 PAGE 3 OF 3

ANALYSIS OF OCCURRENCE:

The Technical Specification Surveillance Requirements are required to be performed at prescribed intervals to ensure system and/or equipment operability. Although 2CC37 was not locked, flow through the heat exchanger was maintained at all times and the temperature of the Spent Fuel Pit remained within specification, as evidenced by the lack of temperature alarms. This occurrence involved no undue risk to the health or safety of the public. However, due to not complying with the Technical Specification Surveillance Requirement for unlocked valves, this event is reportable in accordance with the Code of Federal Regulations, 10CFR 50.73(a)(2)(i)(B).

CORRECTIVE ACTION:

Upon discovery of the error, a lock was installed on 2CC37. The audit revealed no similar problems associated with any of the other valves in the Component Cooling System. However, a review of Operating Instructions (O.I.) II-8.3.2 (Spent Fuel Pit Cooling System Operation) and II-7.3.2 (Component Cooling System Operation) revealed a technical discrepancy between the two. O.I. II-7.3.2 correctly states 2CC37 is adjusted for the required flow through the Spent Fuel Pit Heat Exchanger, while O.I. II-8.3.2 requires throttling of 2CC38 (Spent Fuel Pit Heat Exchanger Outlet Valve). O.I. II-8.3.2 will be changed to reflect the correct operation of throttling flow using 2CC37.

In addition, since the heat exchanger outlet valve (2CC38) should be open for proper system operation, and the flow control valve (2CC37) is periodically adjusted to maintain the Spent Fuel Pit temperature within specification, 2CC38 will be opened and locked, and the lock will be removed from 2CC37. Surveillance Procedure SP(0) 4.7.3.1 (Component Cooling System Thirty-one Day Surveillance) will be changed; i.e., 2CC38 will be removed and 2CC37 will be added to the periodic surveillance. TRIS will be updated to reflect this change. Until the procedural change is completed, 2CC37 will remain locked.

General Manager-Salem Operations

JLR:tns

SORC Mtg 84-123



Public Service Electric and Gas Company P.O. Box E Hancocks Bridge, New Jersey 08038

Salem Generating Station

September 12, 1984

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

Dear Sir:

SALEM GENERATING STATION LICENSE NO. DPR-75 DOCKET NO. 50-311 UNIT NO. 2 LICENSEE EVENT REPORT 84-020-00

This Licensee Event Report is being submitted pursuant to the requirements of 10CFR 50.73(a)(2)(i)(B). This report is required within thirty (30) days of discovery.

Sincerely yours,

J. M. Zupko, Jr. General Manager -Salem Operations

JR:kll

CC: Distribution

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