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Harry P. Salmon, Jr.
Resident Manager

July 06, 1992
JAFF-92-0517

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

SUBJECT: DOCKET NO. 50-333
LICENSEE EVENT REPORT: 92-032-00 - Incomplete
Surveillance Due to Procedure
Deficiency

Dear Sir:

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

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

Very truly yours,

A handwritten signature in cursive script, appearing to read 'Harry P. Salmon, Jr.'.

HARRY P. SALMON, JR.

^{WVC}
HPS:WVC:tmk

Enclosure

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

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Cent No P629542768

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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 20503.

LICENSEE EVENT REPORT (LER)

FACILITY NAME (1) James A. FitzPatrick Nuclear Power Plant		DOCKET NUMBER (2) U 5 0 0 0 3 3 3	PAGE (3) 1 OF 0 4
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TITLE (4) Primary Containment Isolation Logic Testing Incomplete due to Procedural Deficiency

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 6	0 5	9 2	9 2	0 3	2	0 7	0 6	9 2			0 5 0 0 0
											0 5 0 0 0

OPERATING MODE (8) N

POWER LEVEL (10) 0 0 0

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

20.402(b)	20.405(c)	60.73(a)(2)(iv)	73.71(b)
20.405(a)(1)(i)	50.36(a)(1)	50.73(a)(2)(v)	73.71(a)
20.405(a)(1)(ii)	50.36(a)(2)	50.73(a)(2)(vi)	OTHER (Specify in Abstract below and in Text, NRC Form 366A)
20.405(a)(1)(iii)	X 50.73(a)(2)(ii)	50.73(a)(2)(vii)(A)	
20.405(a)(1)(iv)	50.73(a)(2)(iii)	50.73(a)(2)(vii)(B)	
20.405(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: AREA CODE 3 1 5, NUMBER 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 1800 words, i.e. approximately fifteen single space typewritten lines) (16)

EIIS Codes are in []

The plant was shutdown and in cold condition for maintenance and refuel with all irradiated fuel in the spent fuel pool. On 6/5/92 it was determined that a portion of the primary containment [NH] isolation logic [JE] had not been periodically tested as a result of a procedure deficiency. The Residual Heat Removal/Low Pressure Coolant Injection (RHR/LPCI) [BO] injection valve closure logic (in response to low reactor water level while RHR/LPCI is aligned for operation in the shutdown cooling mode) had not been periodically demonstrated to be operable as required by Technical Specification Table 4.2-1 since initial plant licensing. Procedure changes will correct the deficiency and the required surveillance will be performed prior to fuel loading. LER-89-008, 90-007 and 90-015 describe similar cases where procedure inadequacy resulted in missed surveillance.

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-630), 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 9 2	SEQUENTIAL NUMBER — 0 3 2	REVISION NUMBER — 0 0			

TEXT (If more space is required, use additional NRC Form 386A's) (17)

EIIIS Codes are in []

Description

The plant was shutdown and in the cold condition for maintenance and refuel with all irradiated fuel stored in the spent fuel pool. On June 5, 1992 it was determined that surveillance testing required by Technical Specification Table 4.2-1 was incomplete. Table 4.2-1 requires functional testing of the isolation logic [JE] for Residual Heat Removal/Low Pressure Coolant Injection (RHR/LPCI) [BO] shutdown cooling mode primary containment [NH] isolation valves.

During the current refueling outage RHR/LPCI shutdown cooling mode suction valve 10MOV-17 was replaced. Following replacement of the valve an existing Surveillance Test was being evaluated for possible use as a test procedure to demonstrate proper restoration of the electrical circuitry. During this evaluation it was determined that the existing procedure was inadequate in that it did not verify that the logic circuits provide a valve closure signal to all of the valves associated with the control logic.

RHR/LPCI shutdown cooling isolation logic is automatically actuated by reactor pressure increasing above the shutdown cooling permissive (nominally 75 psig) or in response to a low reactor water level (nominally 177 inches above the top of active fuel). During the post work test planning for 10MOV-17 (the shutdown cooling outboard suction valve) it was determined that the surveillance test did not verify existence of an automatic closure signal to valves 10MOV-25A and 10MOV-25B in response to low reactor level. These valves are the LPCI and shutdown cooling mode inboard injection valves. The automatic closure (isolation) is intended to mitigate postulated loss of reactor coolant inventory due to draindown or pumpdown events involving the associated RHR/LPCI system when aligned for operation in the shutdown cooling mode.

Review of plant records indicates this procedure deficiency has existed since the initial licensing of the plant.

A systematic review of surveillance test procedures has been initiated. This review is intended to verify that each surveillance procedure adequately implements the required surveillance at the specified surveillance interval (frequency). This activity had not progressed to the point where the procedure for implementing the functional test of the shutdown cooling isolation logic had been evaluated.

LICENSEE EVENT REPORT (LER)
TEXT CONTINUATION

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 60.0 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE RECORDS AND REPORTS MANAGEMENT BRANCH (P-630), 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	LER NUMBER (5)			PAGE (3)		
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER			
		9 2	— 0 3 2	— 0 0	0 3	OF	0 4

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

Cause

The event was caused by a procedure deficiency. The procedure does not include verification of an automatic closure signal to valves 10MOV-25A and 10MOV-25B in response to low reactor water level when the RHR/LPCI System is lined up for operation in the shutdown cooling mode.

Analysis

The failure to test all of the features of the shutdown cooling isolation logic circuits is a violation of Technical Specification Table 4.2-1 requirements. As a result, the event requires a report under 10CFR50.73(a)(2)(i)(B).

The procedure deficiency that resulted in the failure to periodically test the low reactor water level isolation function of the shutdown cooling isolation logic could result in a condition where inoperability of the isolation function is not detected.

The automatic closure of valves 10MOV-25A and 10MOV-25B, as well as the automatic closure of shutdown cooling suction valves 10MOV-17 and 10MOV-18 and reactor head spray valves 10MOV-32 and 10MOV-33 when low reactor water level occurs, is intended to isolate the RHR/LPCI system from the reactor vessel because the postulated draindown (or pumpdown) events that could cause the low reactor level condition to exist could be the result of valve misalignment or leaks within the RHR/LPCI system. The failure of valves 10MOV-25A and 10MOV-25B to close (due to a logic system failure that is undetected as a result of the procedure deficiency) would allow the draindown or pumpdown to continue if the check valves in series with valves 10MOV-25A and 10MOV-25B also failed to close.

Corrective Action

1. The surveillance test procedure will be corrected and the automatic closure signal for valves 10MOV-25A and 10MOV-25B will be demonstrated operable prior to refueling. Currently scheduled for July 15, 1992.
2. The review of surveillance procedures to verify that they adequately implement surveillance requirements will be completed. This activity will identify any additional examples of procedure deficiencies. Scheduled due date December 31, 1993.

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 (F-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 9 2	LER NUMBER (6)			PAGE (3)	
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER		
			0 3 2	0 0	0 4	OF 0 4

TEXT (If more space is required, use additional NRC Form 350A's) (17)

Additional Information

Failed Components None

Previous Similar Events: LER-89-008, 90-007 and 90-015 are similar events in which a procedure deficiency resulted in incomplete or missed surveillance.