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E. DENTON
GENERAL MANAGER
CALVERT CLIFFS

July 22 1992

U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

ATTENTION: Document Control Desk

SUBJECT: Calvert Cliffs Nuclear Power Plant
Unit No. 1; Docket No. 50-317; License No. DPR 53
Licensee Event Report 92-006

Gentlemen:

The attached report is being sent to you as required under 10 CFR 50.73 guidelines. Should you have any questions regarding this report, we will be pleased to discuss them with you.

Very truly yours,

RED/DWM/bjd
Attachment

cc: D. A. Brune, Esquire
J. E. Silberg, Esquire
R. A. Capra, NRC
D. G. McDonald, Jr., NRC
T. T. Martin, NRC
P. R. Wilson, NRC
R. I. McLean, DNR
J. H. Walter, PSG
Director, Office of Management Information
and Program Control

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PDR ADDCK 05000317
S PDR

JEH

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-533), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, D.C. 20545, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503

LICENSEE EVENT REPORT (LER)

FACILITY NAME (1) Calvert Cliffs, Unit 1	DOCKET NUMBER (2) 0 5 0 0 0 3 1 7	PAGE (3) 1 OF 0 4
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TITLE (4) **Valve in Action Range Not Tested Monthly as Required by ASME Code Due to Lack of Review**

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 NUMBERS(S)
0 6	2 3	9 2	9 2	0 0 6	0 0	0 7	2 2	9 2		0 5 0 0 0
										0 5 0 0 0

OPERATING MODE (9) 5	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR (Check one or more of the following) (11)				
POWER LEVEL (10) 0 0 0	<input type="checkbox"/> 20.402(b)	<input type="checkbox"/> 20.405(c)	<input type="checkbox"/> 50.73(a)(2)(iv)	<input type="checkbox"/> 73.71(b)	OTHER (Specify in Abstract below and in Text, NRC Form 366A)
	<input type="checkbox"/> 20.405(a)(1)(i)	<input type="checkbox"/> 50.36(c)(1)	<input type="checkbox"/> 50.73(a)(2)(v)	<input type="checkbox"/> 73.71(c)	
	<input type="checkbox"/> 20.405(a)(1)(ii)	<input type="checkbox"/> 50.36(c)(2)	<input type="checkbox"/> 50.73(a)(2)(vii)		
	<input type="checkbox"/> 20.405(a)(1)(iii)	<input checked="" type="checkbox"/> 50.73(a)(2)(i)	<input type="checkbox"/> 50.73(a)(2)(viii)(A)		
	<input type="checkbox"/> 20.405(a)(1)(i-)	<input type="checkbox"/> 50.73(a)(2)(ii)	<input type="checkbox"/> 50.73(a)(2)(viii)(B)		
	<input type="checkbox"/> 20.405(a)(1)(v)	<input type="checkbox"/> 50.73(a)(2)(iii)	<input type="checkbox"/> 50.73(a)(2)(ix)		

LICENSEE CONTACT FOR THIS LER (12)

NAME D. W. Muth, Compliance Engineer	TELEPHONE NUMBER
	AREA CODE: 4 1 0 2 6 0 - 3 5 9 2

COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)									
CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS

SUPPLEMENTAL REPORT EXPECTED (14)	EXPECTED SUBMISSION DATE (14)	MONTH DAY YEAR
YES (If yes, complete EXPECTED SUBMISSION DATE) <input checked="" type="checkbox"/> NO <input type="checkbox"/>		

ABSTRACT (Limit to 1400 spaces, i.e., approximately fifteen single-space typewritten lines) (16)

On June 23, 1992, during an inspection of BG&E's Inservice Test (IST) Program, it was noticed that a valve found in the alert range during an October 25, 1991 inservice test had not been placed in the Supplemental Test Program for monthly testing as required by ASME Section XI. Results from subsequent tests indicated that the valve was not degrading. The IST Engineer reviewed the records for all IST valves for the last three test cycles and determined that this was an isolated case.

The immediate cause of this event was personnel error. The root cause of this event is the lack of sufficient defense-in-depth in that the procedure which governs the IST program does not require any second check of the valves' test values.

A new set of IST administrative procedures are scheduled for implementation by the end of the year. A second check of the IST Engineer's review of IST results will be included in the revised IST process. Management has already directed these reviews to be started pending adoption of the formal procedure.

Appropriate personnel actions were taken.

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

FACILITY NAME	DOCKET NUMBER	LER NUMBER	PAGE
Calvert Cliffs, Unit 1	05000317	92-006-00	02 OF 04

TEXT (if more space is required, use additional forms)

I. DESCRIPTION OF EVENT

On June 23, 1992, during an inspection of BG&E's Inservice Test (IST) Program, it was noticed that a valve found in the alert range during an October 25, 1991 inservice test had not been placed in the Supplemental Test Program for monthly testing as required by ASME Section XI. Results from subsequent tests indicated that the valve was not degrading. At the time of discovery, Unit 1 was in MODE 5 at atmospheric temperature and pressure.

For each valve in the IST program, an "action" level is set corresponding to the limiting stroke time for valve OPERABILITY. The action level for each valve is constant. ASME Section XI paragraph IWV-3417(a) requires that, if a valve with a full stroke time greater than 10 seconds exhibits an increase in stroke time of 25 percent or more over that of its previous test, the valve's test frequency shall be increased to once a month until corrective action is taken, at which time the original test frequency shall be resumed. The value of 25 percent over the last measured stroke time but below the action level is known as the "alert" range. The purpose of the alert range is to identify accelerated degradation of IST valves as evidenced by stroke time increases.

On October 25, 1991, Surveillance Test Procedure (STP) O-65C-1, "12 Service Water System Valve Quarterly Test," was performed on the 11 Spent Fuel Pool Cooler Heat Exchanger Isolation Valve (1-SRW-1597-CV). The valve closure time was 15.7 seconds, below the valve's Section XI action limit of 23 seconds but above the valve's alert limit of 15.5 seconds. Since alert range limits are not required to be listed in the STP, the personnel performing the test and accepting the results were unaware that the valve was in its alert range. The action level is listed in the STP so that, had the valve's stroke time exceeded the action level, Operations personnel would have known that the valve was inoperable.

The STP was completed and forwarded to the Functional Surveillance Test Coordinator (FSTC), who reviewed the STP and passed it on to the IST engineer, who recorded the stroke times for the valves and checked them against their alert limits. Only the IST Engineer, who calculated the alert range value, knew the alert limit. However, during his review, the IST engineer missed the fact that 1-SRW-1597-CV was in the alert range and therefore did not add it to the Supplemental Test Program for monthly testing as required by ASME Section XI paragraph IWV-3417(a). This constitutes a violation of Technical Specification 4.0.5, which requires that inservice testing be performed in accordance with ASME Section XI.

On June 23, 1992, an NRC inspector reviewing the IST program noticed that, although 1-SRW-1597-CV had been found in the alert range on October 25, 1991, it had not been tested monthly afterward. The IST Engineer reviewed the records for all IST valves for the last three test cycles and determined that this was an isolated case. No other alert range results had been overlooked.

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II. CAUSE OF EVENT

The immediate cause of this event was personnel error. The IST Engineer is charged with identifying valve test results in the alert range and adding the affected valves to the Supplemental Test program. In this case, he did not exercise sufficient attention to detail and missed this valve.

The root cause of this event is the lack of sufficient defense-in-depth in that the procedure which governs the IST program leaves the identification of valves in the alert range entirely up to the IST Engineer and does not provide for any second check of his work.

III. ANALYSIS OF EVENT

There were no safety consequences or significance as a result of this condition. The valve was fully capable of performing its safety function of isolating the Spent Fuel Pool Heat Exchanger in the event of a Containment Spray initiation. The valve's stroke time remained below its action time limit. The valve was therefore OPERABLE.

On June 24, 1992 the IST Engineer reviewed the records for valve 1-SRW-1597-CV and found that the October 25, 1991 stroke time was anomalous and not indicative of degradation of the valve. The valve had been tested on January 17, 1992; March 16, 1992; and June 23, 1992 and had not exhibited an increasing stroke time trend.

This item is reportable under the provisions of 10 CFR 50.73 (A)(2)(1)(B) as a condition prohibited by the plant's Technical Specifications.

IV. CORRECTIVE ACTIONS

- A. All IST valve test results were reviewed to verify that no alert range data had been missed in the last three cycles. None had been.
- B. A second check of the IST Engineer's review of IST results is presently being performed and will be included in a new set of IST administrative procedures, scheduled for implementation by the end of the year.
- C. Appropriate personnel actions were taken to address the human performance aspects of this event.

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TEXT (if more space is required, use additional forms)

V. ADDITIONAL INFORMATION

A. Affected Component Identification:

	IEEE 803 EIIIS Funct	IEEE 805 System ID
Spent Fuel Pool Isolation Valve	ISV	DA
Spent Fuel Pool Heat Exchanger	HX	DA

B. Previous Similar Events:

There have been no events reported under 10 CFR 50.73 involving similar instances in which lack of follow-up review resulted in ASME Section XI violations.