NRC Form 366
(9-83)

U.S. NUCLEAR REGULATORY COMMISSION
APPROVED OMB NO. 3150-0104
EXPIRES: 8/31/85

# LICENSEE EVENT REPORT (LER)

| FACILITY NAME (1) | DOCKET NUMBER (2) | PAGE (3) |
|---|---|---|
| Washington Nuclear Plant - Unit 2 | 0 5 0 0 0 3 9 7 | 1 OF 0 3 |

TITLE (4)
Primary Containment Integrity

| 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 5 0 0 0 |
| 1 2 | 2 0 | 8 4 | 8 4 | — 1 3 0 | — 0 1 | 0 1 | 2 5 | 8 5 | | 0 5 0 0 0 |

OPERATING MODE (9): 1

POWER LEVEL (10): 1 0 0

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

| | | | |
|---|---|---|---|
| 20.402(b) | 20.405(c) | 50.73(a)(2)(iv) | 73.71(b) |
| 20.405(a)(1)(i) | 50.36(c)(1) | 50.73(a)(2)(v) | 73.71(c) |
| 20.405(a)(1)(ii) | 50.36(c)(2) | 50.73(a)(2)(vii) | X OTHER (Specify in Abstract below and in Text, NRC Form 366A) |
| 20.405(a)(1)(iii) | X 50.73(a)(2)(i) | 50.73(a)(2)(viii)(A) | 50.72(b)(2)(ii) |
| 20.405(a)(1)(iv) | 50.73(a)(2)(ii) | 50.73(a)(2)(viii)(B) | |
| 20.405(a)(1)(v) | 50.73(a)(2)(iii) | 50.73(a)(2)(x) | |

LICENSEE CONTACT FOR THIS LER (12)

| NAME | TELEPHONE NUMBER |
|---|---|
| R. L. Koenigs, Compliance Engineer | AREA CODE 5 0 9 — 3 7 7 - 2 5 0 1 Ext. 2279 |

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 | |
|---|---|---|---|---|---|---|---|---|---|---|---|
| A | NH | - - - | - - - | N | | | | | | | |
| D | NH | - - - | - - - | N | | | | | | | |

SUPPLEMENTAL REPORT EXPECTED (14)

| | | EXPECTED SUBMISSION DATE (15) | MONTH | DAY | YEAR |
|---|---|---|---|---|---|
| YES (If yes, complete EXPECTED SUBMISSION DATE) | X NO | | | | |

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

A review of the Plant procedure by which containment integrity is verified was in progress. On 12/20/84 this review identified a number of primary containment isolation valves which were not being verified in accordance with Plant Technical Specifications. Procedure changes are being made to completely identify these valve position verification requirements.

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

Plant Conditions

a) Power Level - 100%
b) Plant Mode - 1

Event

On 12/20/84, a containment integrity verification procedure revision was undergoing reveiw prior to Plant Operations Committee (POC) approval. This review process identified twenty-five (25) valves, all cutside the Primary Containment, which were not part of the verification but should have been included. Eight (8) of the 25 valves are listed in FSAR Table 6.2-16 as being primary containment isolation valves and had been overlooked during development of this procedure. Seven (7) of these 8 valves were motor operated valves (MOV's) which had been closed and the motor power supply deenergized. This was the result of Plant changes which deleted the RHR steam condensing mode of operation. Both of these actions were covered by a Plant Clearance Order. The eighth valve was not in the original design and was added just prior to Plant fuel load. The remaining 17 valves were not previously identified by the FSAR as primary containment isolation valves. These 17 are comprised of various vent, drain and test connection valves.

The procedure review also identified that FPC-V-149 was open, versus closed as specified by the Plant procedure governing Primary Containment Integrity (per Technical Specification 3.6.1.1). The containment integrity verification procedure specified that FPC-V-149 was to be in a locked closed position. During performance of previous surveillances, Plant operators mistakenly assumed that the FPC System could be operated in the suppression pool cleanup mode during power operations. The open position of FPC-V-149 was therefore not questioned and, with an explanatory note, was accepted as satisfying the requirements without processing a procedure deviation.

Additionally, this procedure review identified approximately 12 test connection, vent and drain valves inside containment which were not being verified. The T.S. requires these valve positions to be verified once per 92 days provided the Reactor is in cold shutdown (CSD) and the containment de-inerted.

Immediate Corrective Action

o All accessible outside containment isolation valves were verified to be in the correct positions on 12/20/84.

Further Corrective Action

o The Primary Containment Integrity verification procedure has been revised to include all outside containment valve verification requirements. A procedure for Inside Primary Containment Integrity Verification has been written and is in the review process.

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- o The Supply System will evaluate the necessity for FPC to have two isolation valves per General Design Criteria (GDC) 56. There are presently several similar systems which have been evaluated and judged to require only a single isolation valve. Should single isolation be evaluated as sufficient for the FPC System, FPC-V-149 would not be required as an isolation valve. Should both isolation valves be determined necessary, we will pursue a design change to provide the second isolation valve with non-manual operation. The FSAR will be updated to include a discussion of GDC 56 with regard to the FPC System.

- o During the next period in which the Plant is in CSD and de-inerted all inside containment valve positions will be verified.

- o Each operating crew will receive additional instruction on the requirements for T.S. surveillance performance.

Safety Significance

The establishment of Primary Containment Integrity ensures that the release of radioactive materials from the containment will be restricted to those leakage paths and rates assumed in the FSAR. This restriction is relied upon to limit the Site Boundary radiation doses to within the limits established by 10CFR100 during accident conditions.

The FPC System is a closed system when operated in the suppression pool cleanup mode. FPC-V-149 is a manual isolation valve for the return leg to the suppression pool. Downstream of, and in series with FPC-V-149, there is FPC-V-156, a MOV containment isolation valve which was operable during the time of this event. Upstream of FPC-V-149 there are two possible process flow paths: FPC-V-147 is one path and is normally closed in this mode; FPC-V-140 is the second process flow path and is a check valve that would prohibit reverse flow in this mode. Thus, FPC-V-140 and 147, both within the Reactor Building, would have provided the containment isolation function equivalent to FPC-V-149. The piping, approximately 60 feet, between FPC-V-149 and FPC-V-140 and 147 is Seismic Category I. All FPC piping utilized in this mode is supported Seismic Category I.

In this instance, with the exception of FPC-V-149, all outside accessible primary containment valves in question were found to be in the correct positions. Leakage associated with test connection, vent and drain valves inside containment would have been detected by the Leakage Detection System sumps. To date no unidentified leakage from these valves has been detected. Additionally, an Integrated Leak Rate Test was performed in February, 1984 which established the valve positions inside containment and verified acceptable leakage rates per the Appendix J requirements.

At no time has WNP-2 been in a condition for which these valves would be required to limit Site Boundary radiation doses. There was no hazard to the health and safety of either Plant personnel or that of the public.

Similar Event

See LER 84-100

**Washington Public Power Supply System**
P.O. Box 968 3000 George Washington Way Richland, Washington 99352 (509) 372-5000

Docket No. 50-397

January 25, 1985

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

Subject: NUCLEAR PLANT NO. 2
LICENSEE EVENT REPORT NO. 84-130-01

Dear Sir:

Transmitted herewith is Licensee Event Report No. 84-130-01 for WNP-2 Plant. This report is submitted in response to the report requirements of 10CFR50.73 and discusses the item of reportability, corrective action taken, and action taken to preclude recurrence and corrects an inadvertent reference to Appendix K which was contained in Licensee Event Report 84-130.

Very truly yours,

CM Powers for
J. D. Martin (M/D 927M)
WNP-2 Plant Manager

JDM:mm

Enclosure:
Licensee Event Report No. 84-130-01

cc: Mr. John B. Martin, NRC - Region V
Mr. A. D. Toth, NRC - Site (901A)
Ms. Dottie Sherman, ANI
INPO Records Center - Atlanta, GA

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