

SEP 28 1983

MEMORANDUM FOR: Hugh C. Dance
Project Branch #2
Division of Project and Resident Programs, RII

FROM: Karl V. Seyfrit, Chief
Reactor Operations Analysis Branch
Office for Analysis and Evaluation
of Operational Data

SUBJECT: EVALUATION OF LERs FOR NORTH ANNA 1 AND 2 FROM
SEPTEMBER 1, 1982 TO AUGUST 31, 1983 - AEOD INPUT
TO SALP REVIEW

In support of the ongoing SALP reviews, AEOD has reviewed the LERs for North Anna Units 1 and 2. From the LERs that were reviewed, we thought that the licensee did an excellent job of reporting. We were particularly impressed with the large number of reports with supplemental information and with the content of the supplemental information. In addition, the coded information was excellent. However, we were uncertain as to whether an adequate number of reports were being updated, and the licensee did not reference previous LER numbers of events of a similar nature on the LER Form.

The enclosure provides additional observations from our review of the LERs. If you have any questions regarding this report, please contact either myself or Ted Cintula of my staff.

Karl V. Seyfrit, Chief
Reactor Operations Analysis Branch
Office for Analysis and Evaluation
of Operational Data

Enclosure:
As stated

cc w/enclosure:
L. Engle, NRR
D. Johnson, RII
W. Lanning, AEOD

Distribution:

DCS
AEOD CF ✓
ROAB RF
T. Cintula, ROAB
E. Imbro, ROAB
K. Seyfrit, C/ROAB
T. Ippolito, DD/AEOD
C. Heltemes, D/AEOD

ROAB

A/4/25

TCC.

OFFICE	ROAB	ROAB	C/ROAB		
TURNAME	TCintula:bc	EImbro	KSeyfrit		
DATE	9/22/83	9/22/83	9/26/83		

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AEOD SALP REVIEW FOR NORTH ANNA 1 AND 2

The licensee submitted over 90 LERs for Unit 1 from October 1, 1982 to September 30, 1983. Our review included the following LER numbers:

82-060 through 82-091
83-001 through 83-030

The review did not include the LERs for Unit 2 because the two units, their corporate structure and their LER preparer were the same. Because of the commonality of both units, it would seem that the problems and method of LER submittals would be the same for both units, so the LER review for Unit 1 should also be applicable for Unit 2. However, as a check, several LERs were reviewed for Unit 2 and we could not find substantial differences in the methods of reporting. Also, the later LERs for Unit 1 were not readily available. We randomly reviewed LERs from 83-030 to 83-056 to see if differing trends from the LERs that we reviewed were apparent. We noted no differences.

For Unit 1, all the LERs were consecutively numbered, so there were no missing, unsequentially numbered or cancelled LERs in this review. No special reports were received in the assessment period. The LER review for Unit 1 followed the general instructions and procedures of NUREG-0161.

1. Review of LERs for Completeness

- a) Is the information sufficient to provide a good understanding of the event?

The information in the free-form narrative sections of the LER Form was consistently brief. There were no instances of overrunning narratives, a recurring problem with some licensees. Despite the conciseness of the licensee response in the two free-form sections of the LER Form, we found the information exceptionally informative,

complete and meaningful. We believe the licensee interpreted and complied exactly with the intent of the procedures of NUREG-0161.

b) Review of Coded Information

We checked the codes the licensee selected against the narrative sections for accuracy. We agreed with the licensee's selection of codes in every instance. This is the first time this degree of agreement has occurred in our SALP review and in view of the quantity of information available (approx. 45 x 60) and the subjectiveness of some code decisions, we could only conclude that the coded information was perfect. In addition, each coded entry was typed and centered within the boxes. There were no typos or omissions. The form was neat in appearance.

c) Do the reports contain supplementary information when needed?

The licensee readily provided additional information to the LER Form. In the 61 LERs that we reviewed, 50 LERs were submitted with supplemental information. The attachments provided specific detailed information useful in assessing the full impact of the event. The licensee's safety assessment of the event was detailed and meaningful and its potential consequences could be determined by someone reasonably familiar with the plant. The attachments were well organized with each event discussion separated and titled. The reports without attachments did not need additional explanation. We concluded that the licensee responded with additional information readily and the additional information was pertinent and useful.

d) Follow-up Reports

The licensee did not promise any followup reports. However, five updated reports were received for Unit 1 and four reports were received

for Unit 2. Two reports were updated twice. The low percentage of updated reports may be due, at least in part, to the completeness of the original submittals. Even so, it seems too few reports were being updated. The reports that were updated were updated correctly in accordance with the guidelines of NUREG-0161.

e) Were similar occurrences properly referenced?

The licensee did not reference previous LERs of similar events. Instead, the licensee made a determination as to whether the event had generic implications only at North Anna 1 and 2. In this determination, the licensee found only 9 events with generic implications and 41 without generic implications (although we noted some of these events were repetitive). Five events had no statement of generic implication.

We do not construe a statement of the perceived generic implications at the site to be equivalent to referencing the previous LER numbers of events of a similar nature (NUREG-0161, Page 11, Paragraph 7). This information is provided by all other licensees and it has proven to be a simple efficient method to link events of similar nature. The licensee should begin designating previous event numbers on the LER Form.

2. Is component failure or other appropriate information being reported to NPRDS?

The licensee apparently did not begin reporting to NPRDS until LER 83-017 (May 16, 1983). After this date many of the LERs indicated an NPRDS-4 Form had been submitted.

3. Multiple event reporting in a single LER.

The licensee combined multiple events correctly into a single LER in accordance with the guidance offered in NUREG-0161.

4. Relationship Between PNs and LERs.

Only two PNs were issued for North Anna 1 in the assessment period, each for a failure to the main transformer. There were no LERs directly applicable to this problem. Because of the lack of PNs issued in the assessment period, it is impossible to make an informed judgment as to whether the licensee is reporting all events that should be reported.



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

SEP 28 1983

MEMORANDUM FOR: William C. Seidle
Reactor Project Branch 2
Division of Resident Reactor Projects
and Engineering Programs, RIV

FROM: Karl-V. Seyfrit, Chief
Reactor Operations Analysis Branch
Office for Analysis and Evaluation
of Operational Data

SUBJECT: EVALUATION OF LERs FOR FORT CALHOUN-1 FOR THE
PERIOD FROM SEPTEMBER 1, 1982 TO AUGUST 31, 1983 -
AEOD INPUT TO SALP REVIEW

In support of the ongoing SALP reviews, AEOD has reviewed the LERs for Fort Calhoun Station. This is our second review for Fort Calhoun. Last year, we thought that the licensees submittals were well above average, certainly among the very best that we reviewed. In this review, we could not determine any changes from last years submittals, either in improvements or in newly identified deficiencies. Consequently, our opinion is the same; we think that their LERs are among the very best that we have reviewed. As we continue to participate in the SALP reviews and examine other licensee submittals we have become even more impressed with the extent of the meaningful information typically supplied by the licensee in the safety analysis. On the negative side, we noted that overrunning narratives still occur in the LER Form. The other items that we commented on last year did not have opportunity to recur in this assessment period so no comments are offered.

The enclosure provides additional observations from our review of the LERs. If you have any questions regarding this report, please contact either myself or Ted Cintula of my staff.

Eugene V. Umbro
for Karl V. Seyfrit, Chief
Reactor Operations Analysis Branch
Office for Analysis and Evaluation
of Operational Data

Enclosure:
As stated

cc w/enclosure:
E. Tourigny, NRR
L. Yandell, RIV

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AEOD SALP REVIEW FOR FORT CALHOUN

The licensee submitted only 11 LERs in the assessment period from September 1, 1982 to August 31, 1983. Our review included the following LER numbers:

82-018 through 82-021
83-001 through 83-007

The LERs were consecutively numbered so there were no missing, unsequentially numbered or cancelled LERs in this review. No special reports were submitted in the assessment period. The LER review followed the general instructions and procedures of NUREG-0161.

1. Review of LERs for Completeness

- a) Is the information sufficient to provide a good understanding of the event?

The information in the two free-form narrative sections of the LER Form was consistently informative, complete and meaningful. However, the abstracts were typically not short enough to fit the number of computer spaces available in each section (LERs 82-018, 021 and 83-005). Overrunning narratives were mentioned as a problem in the previous SALP review, and in the case of Fort Calhoun, they are unnecessary because the attachments are so complete.

- b) Review of Coded Information

We checked the codes the licensee selected against the narrative sections for accuracy. We agreed with the licensee in all coded fields. In addition, each coded entry was typed and centered within the coded boxes. There were no typos or omissions. The form was neat in appearance.

- c) Do the reports contain supplementary information when needed?

Every report contained additional supplementary information in the form of attachments. The attachments were titled and consistently arranged with attachment No. 1 always the safety analysis, attachment No. 2 the corrective action, and attachment No. 3 the failure data. We thought that the safety analysis was as good as any reviewed. The specific detail and the organization of the attachments greatly contributed to the usefulness of the report.

d) Follow-up Reports

The licensee did not promise to update any reports, and none were received in this assessment period. We checked the data base and found the last updated report was 82-017. The previous update reports were 82-002 and 003, so the licensee is apparently updating a normal proportion of reports.

e) Were similar occurrences properly referenced?

The licensee stated the judgement criteria used to define a similar event, the number of times the similar event occurred, and the previous LER numbers. In addition, when there have been no previous events, the licensee positively makes the statement that this is the first reportable occurrence of this type. LER 83-004, failed to reference the previous LER number (this was the second reportable failure). We consider this to be a unique omission rather than indicative of a trend.

2. Is component failure or other appropriate information being reported to NPRDS?

The licensee apparently did not begin reporting to NPRDS until LER 82-004 (6/29/83). Most of the remaining LERs indicated an NPRD-4 Form had been submitted.

3. Multiple event reporting in a single LER.

The licensee did not report any multiple events in this assessment period.

4. Relationship between PNs and LERs.

Only two PNs were issued for Fort Calhoun in this assessment period; a leaking steam generator handhole on 10/25/82 and two damaged turbine journal bearings on 12/6/82. In our opinion neither of these events were reportable, and no reports were submitted. Because of the lack of PNs issued in the assessment period, it is impossible to make a informed judgement as to whether the licensee is reporting all events that should be reported.