COMPANY South Texas Project Electric Generating Station P. O. Box 289 Wadsworth, Texas 77483

July 17, 1996 ST-HL-AE-5423 File No.: G26 10CFR50.73

IE22 1.

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

**The Light** 

South Texas Project Unit 1 Docket No. STN 50-498 Licensee Event Report 96-003 Failure to Meet the Requirements of Technical Specification 4.5.2.c Regarding Surveillance Inspection of Containment for Loose Debris

Pursuant to 10CFR50.73, South Texas Project submits the attached Unit 1 Licensee Event Report 96-003 regarding failure to meet the requirements of Technical Specification 4.5.2.c for surveillance inspection of containment for loose debris. This event did not have an adverse effect on the health and safety of the public.

If you should have any questions on this matter, please contact Mr. S. M. Head at (512) 972-7136 or me at (512) 972-7800.

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AZ Parking

G. L. Parkey Plant Manager, Unit 1

KJT/jh

Attachment: LER 96-003 (South Texas, Unit 1)

LER-96\5423

Project Manager on Behalf of the Participants in the South Texas Project

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containment under the engineering evaluation governing the activity. During a subsequent containment entry on May 16, 1996, it was noted that the staged equipment was not contained as required by the engineering evaluation. Evaluation of this occurrence determined the operability of the Emergency Core Cooling System regarding potential blockage of the system pump suction sump screens had not been compromised. The causes of this occurrence were an inadequate review of requirements governing the activity and an inadequate pre-job briefing. Corrective actions included removal of the bagged equipment from containment, completion of a containment closeout inspection of all areas outside the bioshield and providing the lessons learned from this occurrence in the station outage lessons learned program.

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### DESCRIPTION OF EVENT:

On June 20, 1996, Unit 1 was in Mode 1 at 100% power. On this date a determination was made that the requirements of Technical Specification 4.5.2.c were not met on May 15, 1996 due to a containment closeout inspection not recognizing that unauthorized material (i.e. plastic) had been left inside containment.

On May 15, 1996, Unit 1 was in Mode 1 at 100% power. Equipment including several plastic bagged items were staged in the reactor containment building to support work planned for an upcoming refueling outage. The individuals staging the equipment were unaware that the plastic bags were not approved to remain in containment under the engineering evaluation governing the activity. The containment closeout inspection was determined to meet requirements.

During a subsequent containment entry at approximately 0330 hours on May 16, 1996, it was noted that the staged equipment was not contained as required by the engineering evaluation. A determination was made that the requirements of Technical Specification 4.5.2.c were not met in that the staged plastic materials which could potentially block the Emergency Core Cooling System sump screens had not been evaluated. All three Emergency Core Cooling System trains were declared inoperable and Technical Specification 3.0.3 was promptly entered at 0335 hours on May 16, 1996. The bagged equipment was removed from containment and Technical Specification 3.0.3 was exited at 0424 hours on May 16, 1996. A containment closeout inspection of all areas outside the bioshield was completed satisfactorily.

During the performance of the containment closeout inspection on May 15, 1996, it was erroneously concluded that the plastic bags had been authorized by the engineering evaluation governing the activity. Pre-job briefings for staging the equipment did not include the evaluation requirements that equipment be enclosed in metal or hard plastic containers only. The manner in which the bagged items were actually secured provided the evaluator with a high degree of confidence that potential transport of plastic to the containment sump screens was unlikely.

Evaluation of this occurrence determined the operability of the Emergency Core Cooling System would not have been compromised during a design basis loss of coolant accident by the plastic bags. Therefore, entry into Technical Specification 3.0.3 was not required. Technical Specification surveillance 4.5.2.c is met by acceptable performance of the containment inspection plant procedure. Subsequent review of this occurrence determined the containment inspection performed on May 15, 1996 was inadequate. The Nuclear Regulatory Commission Operations Center was notified at 1052 hours on June 20, 1996.

### CAUSE OF EVENT:

The causes of this occurrence were an inadequate review of requirements governing the activity and an inadequate pre-job briefing.

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## ANALYSIS OF EVENT:

Failure to meet the requirements of Technical Specifications is reportable pursuant to 10 CFR 50.73(a)(2)(i)(B). Analysis determined that the Emergency Core Cooling System would not have been compromised during a design basis loss of coolant accident by the plastic bags. A determination was made that no credible scenarios existed, such as a high energy line break or flooding, that could have dislodged the staged equipment from the storage location. Additionally, an analysis determined that if the total volume of melted plastic resulting from a design basis loss of coolant accident reached the containment sump enclosures, the volume would not sufficiently block the sump to render the sump inoperable. There were no adverse safety or radiological consequences of this event.

## CORRECTIVE ACTION:

- 1. The bagged equipment was removed from containment.
- 2. A containment closeout inspection of all areas outside the bioshield was completed satisfactorily.
- 3. The inadequate surveillance and pre-job briefing and potential consequences were discussed with the individuals involved.
- The lessons learned from this occurrence were made part of the overall station outage lessons learned program.

# ADDITIONAL INFORMATION:

Unit 1 Licensee Event Report 94-001 was previously submitted by the South Texas Project to the Nuclear Regulatory Commission regarding small gaps in the Reactor Containment Building emergency sump screens. This Licensee Event Report discussed a surveillance procedure that did not fully meet the requirements for Technical Specification 4.5.2.d in that it did not require the inspector to physically enter the sump to search for debris.